U.S. DEPARTMENT OF COMMERCE
Office of Inspector General

INTERNATIONAL TRADE ADMINISTRATION

Although Progress Has Been Made, More Needs to be Done to Deliver On-line Export Information and Services

Final Inspection Report No. IPE-13213/March 2001

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Office of Inspections and Program Evaluations

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MEMORANDUM FOR: Timothy J. Hauser
Acting Under Secretary for International Trade

FROM: さかrJohnnie E. Frazier

SUBJECT: Final Inspection Report: *Although Progress Has Been Made, More Needs to be Done to Deliver On-line Export Information and Services* (IPE-13213)

As a follow-up to our March 9, 2000, draft report, this is our final report on our evaluation of ITA's web sites that are primarily devoted to export promotion activities.

As noted in the draft report, we were pleased to see that considerable progress has been made on ITA's web sites. The report highlights many of the positive initiatives and outcomes that have occurred on ITA's web site. However, we are concerned about the extent of cooperation within ITA as it develops an integrated web presence. While the ITA Portal Task Force shows an improvement in coordination, consensus at the task force level may not necessarily reflect agreement across all of ITA.

Although your March 28 response to the draft report discusses actions taken or planned by ITA on many of the recommendations, we are requesting additional documentation or clarification in certain areas, all of which are discussed in the body of the attached report. Please provide your action plan within 90 calendar days, which should allow for sufficient time to include focus group results.

We thank the personnel in ITA for the assistance and courtesies extended to us during our review and appreciate the quick turnaround in responding to our draft report. If you have any questions or comments about our report or the action plan, please contact me at (202)482-4661, or Jill Gross, Assistant Inspector General for Inspections and Program Evaluations, at (202)482-2754.

Attachment

EXECUTIVE SUMMARY

The number of people using the Internet is growing at an astounding rate. In 1993, fewer than 90,000 people worldwide were estimated to be using the Internet on a regular basis, and those who did were primarily in academia or the government. By the summer of 2000, there were more than 300 million frequent on-line users, and within five years, the number is expected to pass the 1 billion mark.[1] This exponential growth is accompanied by increasing expectations. As the public conducts more commercial transactions on-line, such as personal finance and banking, travel arrangements, and retail shopping, it also expects more on-line government-to-citizen information, transactions, and services.

Technology, and the Internet specifically, are changing how the government conducts its business and how it communicates—both internally and externally. In recognition of this, the Department of Commerce is planning to move from being a paper-based bureaucracy to a "Digital Department," whereby it will effectively obtain, process, produce, and provide information in the medium that best meets the needs of its employees and customers. Early goals include providing electronic access to all Departmental forms, developing a Commerce Intranet site, and organizing the Commerce Internet home page so that customers can readily access information without having to understand how the Department is organized. Next steps include developing web-based internal administrative and business processes.

This review examined how well the Department of Commerce is using the Internet to provide export promotion information and services to the public. The Department's International Trade Administration leads the federal government's efforts to promote and increase non-agricultural U.S. exports. ITA has three units that principally spearhead its trade promotion efforts: Market Access and Compliance (MAC), the United States and Foreign Commercial Service (US&FCS), and Trade Development (TD).[2]

A growing portion of an organization's public face is often represented by its web site. In exports, as in most areas of major government activity, Internet customers are demanding greater transparency and clarity as well as increased information and services. ITA has recently undertaken several efforts to organize its web presence in a way that helps users find information. It has made considerable progress in improving access to its online information, but there are a number of areas that still need to be addressed. During this review, we worked with officials

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[1] *State of the Internet 2000*, prepared by International Technology and Trade Associates, Inc., for the U.S. Internet Council, September 1, 2000.

[2] We did not include Import Administration, ITA's fourth unit, in the review because its primary responsibility is enforcing laws and agreements that help prevent unfairly traded imports from entering into the United States.

from ITA and the Department to help immediately address many of these weaknesses. We were pleased with both the willingness and speed with which ITA made improvements in response to the concerns brought to its attention by our office, as well as others. Given the rapidly paced Internet environment, we anticipate that many other areas of concern that we identified will get the attention required. A summary of our findings follows:

- **Progress has been made to improve the look, feel, and user friendliness of ITA's web sites.** According to internal ITA documents, ITA's web presence has 112 major points of entry. While many of ITA's units and offices have good web sites, we identified four Internet efforts as particularly noteworthy. First, the Trade Information Center's web site deserves recognition because it was one of the first customer resource and referral centers. The site develops database information or provides links to a number of federal export assistance programs and is known as the first place to go to for trade-related information and assistance. Because the TIC responds to a high volume of telephone calls and e-mail messages, it is able to modify its web site to meet customer needs. Second, the US&FCS web site is an example of a site that has undergone significant improvement. Initially, the 262 US&FCS domestic and foreign offices and programs created their own web sites, resulting in duplication, differences in content and format, and a lack of continuity and consistency from site to site. US&FCS streamlined and considerably improved its web site by standardizing the site format and placing one logo and banner on all US&FCS web pages.

  Finally, ITA has undertaken two commendable efforts to organize its on-line information to make it more user friendly. First, it reorganized the ITA home page so that users can readily access information by topic instead of by organization. Second, it developed a portal that will provide access to all federal agency export promotion efforts. Both ITA and Departmental managers recognized that the delivery of on-line export promotion information and services needed attention and appointed a task force to work on web development initiatives. (See page 6.)

- **Increased coordination is needed to better integrate ITA's web sites.** Although coordination within ITA has improved due to the recent redesign of the home page, more needs to be done to fully integrate ITA's web sites. Because each organization within ITA has developed its own home page, information, and services, duplication and inconsistencies can be found across many of the unit sites. Considerably more work and coordination are needed to better define and present a cohesive, integrated web presence. Not only will the public benefit from improved ease of use and clarity in getting information to help them increase exports, but ITA will also benefit from a reduction in staff time and effort spent on web site design and operations, particularly where duplication exists. Such coordination is much more difficult to accomplish at the interagency level, but it is also needed there. We recommend that ITA establish a

permanent governing board for Internet operations, both within ITA and among federal trade agencies. To ensure that web site improvements become an institutional goal, ITA needs to formalize its coordination internally and with other federal agencies, working primarily through the Trade Promotion Coordinating Committee. (See page 10.)

- **Better planning is essential to provide more products and services on-line.** Recent efforts to improve the public's ability to interact electronically with the federal government have been advanced by the 1998 Government Paperwork Elimination Act. The act requires that, by October 2003, federal agencies provide the public, when practicable, the option of submitting, maintaining, and disclosing information electronically, instead of using paper. GPEA also requires federal agencies to use and accept electronic signatures. ITA's on-line offerings are limited, and to date, the planning for placing activities on-line has not been comprehensive. We believe that ITA needs to revisit decisions to not put some activities on-line, as well as to expand its efforts to identify opportunities for new on-line products and improvements to existing on-line activities. Rather than just automate the current methods used for providing information and services, ITA's planning should consist of a fundamental rethinking and redesign of its products and services that not only meet GPEA requirements, but also achieve improvements in cost, quality, timeliness, and service. (See page 19.)

- **More customer feedback should be sought and used.** We found that ITA has not adequately sought customer input regarding web site user needs and requirements. E-mail comments, complaints, and suggestions are solicited and managed haphazardly, and other types of feedback mechanisms have not been used. Based on the feedback we obtained, more could be done to improve web sites and better meet user needs. ITA should establish a formal process to (1) collect and manage customer e-mails, (2) use focus groups to pre-test changes and new pages, (3) obtain real-time feedback about content, and (4) use aggregate usage data to improve web sites. (See page 24.)

- **Guidance is needed for the construction and maintenance of ITA's web sites.** ITA does not have any official standards in place to manage or control the production of its estimated 300 and more web publishers and content providers. Thus, the quality of each page varies significantly. We identified several problems with the web sites that suggests a need for standards and guidelines, such as pages that collect "cookies,"[3] have outdated and undated information, are indefinitely "under construction," and contain dead links. Even the best looking and most interesting site is likely to be abandoned if it is poorly developed (e.g., difficult to navigate) and maintained. ITA should establish standards to

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[3]A message that a web server causes to be placed on a user's hard drive that can be read by the server (see glossary, page 46).

provide a consistent level of maintenance and quality across the ITA web sites. (See page 30.)

• **Compliance with departmental standards is necessary.** Within Commerce, a number of web site standards have been established. While most ITA web sites are in compliance with the standards, we did find some unit sites with pages that were not. Since there are few incentives for the staff in charge of the web sites to implement the standards, ITA must take responsibility for ensuring prompt compliance. (See page 34.)

• **Guidance and oversight are needed to ensure compliance with the Paperwork Reduction Act of 1995 and Section 508 of the Rehabilitation Act.** Many existing and new federal laws affect the Internet. The Paperwork Reduction Act seeks to minimize the public's burden in responding to government requests for information by requiring that collections be approved by the Office of Management and Budget and that the public be provided with information about the collection. However, we found unapproved collections on ITA's site, as well as approved collections where the required information was missing. We recommend that ITA prepare the necessary guidance and periodically monitor web sites to ensure that staff are aware of and following the law. Section 508 of the 1998 amendments to the Rehabilitation Act requires federal agencies to provide, to people with disabilities, equal access to agency electronic and information technologies, unless the agency can demonstrate an "undue burden." Final accessibility standards were published in December 2000. ITA should take appropriate action to ensure compliance with Section 508 of the Rehabilitation Act once it becomes effective on June 21, 2001. (See page 36.)

During our review, we found a number of external web sites that could be considered best practices because of a unique design or function. We mentioned some of these in our report. Appendix A contains a listing of the organizations and web site addresses we found to be particularly useful. In addition, to assist the reader with acronyms and Internet terms, a glossary is provided in Appendix B. Our recommendations can be found on page 40.

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In response to our draft report (see page 52), ITA agreed that the findings and recommendations were valid, but expressed concern regarding the tone and timing of the review and report, given that ITA is in the process of redesigning its web presence. We recognize that this review was conducted while the redesign was in progress, but believe the timing made it possible for us to identify, and ITA to address, problems and needed improvements during the process.

ITA agreed with all of the recommendations, and has already taken actions that will satisfy many of the recommendations. We request that ITA provide an action plan addressing any outstanding

issues, or requested documentation, as noted in the report.

To address ITA's comments, we have made some minor changes to the report. A copy of ITA's full response is included as Appendix D to the report.

INTRODUCTION

Pursuant to the authority of the Inspector General Act of 1978, as amended, the Office of Inspector General conducted a program evaluation of the International Trade Administration's on-line delivery of products and services. We conducted our review from August 18, 2000 to January 10, 2001. At the conclusion of our review, we discussed our observations and recommendations with the Deputy Under Secretary for International Trade; Deputy Assistant Secretary for Information Technology Services, Trade Development; and Director, Office of Information Resource Management and Acting Chief Information Officer.

Program evaluations are special reviews the OIG undertakes to give agency managers useful information about operations, including current and foreseeable problems. By highlighting problems, the OIG hopes to help managers move quickly to address them and to avoid similar problems in the future. The evaluations are also conducted to detect and prevent fraud, waste, and abuse and to encourage effective, efficient, and economical operations. Program evaluations may also highlight effective programs or operations, particularly if they may be useful or adaptable for agency managers or program operations elsewhere. This evaluation was conducted in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

OBJECTIVES, SCOPE, AND METHODOLOGY

The objective of this program evaluation was to determine the adequacy of ITA's efforts to provide on-line trade and business-related information and services to the public, to identify ways to improve ITA's on-line services, and to suggest relevant best practices used elsewhere in government, or by private or non-government entities.

In conducting the program evaluation, we spoke with (1) web masters, program managers, and other officials in ITA, (2) officials in the Small Business Administration, Department of Energy, and Department of Agriculture, and (3) private sector and government users. We reviewed relevant laws, including the Government Paperwork Elimination Act of 1998, the Paperwork Reduction Act of 1995, and Section 508 of the Rehabilitation Act. We also examined departmental standards, agency guidance, and other pertinent documents and assessed web sites to determine whether such laws and standards and government polices were being followed. Finally, we reviewed a number of non-ITA web sites for comparison purposes.

BACKGROUND

Within a 30-year period, the Internet grew from a cold war concept to the information superhighway. It was not until 1982 that the loose collection of linked computers at the Defense Department, part of its Advanced Research Project Association, was seen as an "internet." The World Wide Web came into being when the Defense Department's network was decommissioned in 1990.[4] In 1993, an estimated 90,000 people worldwide, primarily in academia and the government, regularly used the Internet. By 2000, the number of on-line frequent users had increased to more than 300 million users, and that number is expected to pass the 1 billion mark by 2005.[5]

Advances in the use of information technology (IT) and increases in the number of Internet users continue to transform not only how individuals and businesses interact with one another, but also how federal agencies provide information and services to and interact with the public. Electronic government has been strongly endorsed by the President and executive branch agencies, as well as the Congress to improve the delivery of government information and services. Many federal offices have been using the Internet to collect and disseminate information and forms; buy and pay for goods and services; and enable citizens to file claims, submit bids and proposals, order records, pay taxes, and apply for licenses, grants, and benefits. On-line applications such as these allow 24-hours-a-day, seven-days-a-week access to information and services.

The Department of Commerce is planning to move from being a paper-based bureaucracy to a "Digital Department," whereby it will effectively obtain, process, produce, and provide information in the medium that best meets the needs of its employees and customers. Early goals include providing electronic access to all Departmental forms, developing a Commerce Intranet site, and organizing the Commerce Internet home page so that customers can readily access information without having to understand how the Department is organized. Next steps include developing web-based internal administrative and business processes.

The International Trade Administration leads the federal government's efforts to encourage, assist, and promote U.S. non-agricultural exports and help ensure that U.S. companies have equal access to foreign markets. Both ITA and Department managers have pledged to fully utilize the Internet to fulfill the ITA mission. The ITA Strategic Information Technology Plan states:

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[4]Although the Advanced Research Project Association network ceased to exist, users scarcely noticed because the National Science Foundation system, which was built using the same protocol as the network, was used. *Life on the Internet: Net Timeline*, Public Broadcasting System, http://www.pbs.org/internet/timeline.

[5]*State of the Internet 2000*, prepared by International Technology and Trade Associates, Inc., for the U.S. Internet Council, September 1, 2000.

> *"ITA will lead federal agency efforts to increase U.S. exports and enforce U.S. trade laws by using modern technology to build an electronic global trade information environment that continually increases our ability to collaborate with our partners and stakeholders, and deliver products and services to our clients."*
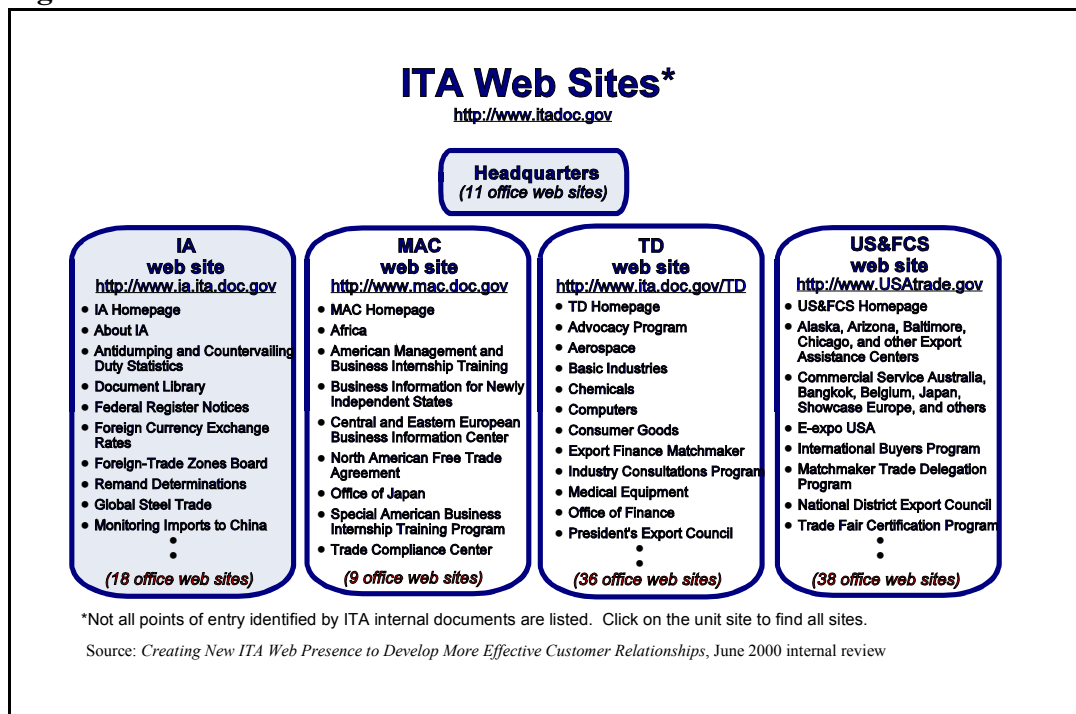
Three out of four of ITA's units deal primarily with exports.[6] Market Access and Compliance (MAC) helps U.S. businesses overcome barriers to trade and investment by providing information that enables U.S. firms to benefit from recent trade agreements that the U.S. has concluded. The MAC web site contains a database with information about the various trade agreements as well as hotline information for U.S. businesses to report potential agreement violations. Trade Development (TD) industry specialists work with industry associations and firms to identify trade opportunities and obstacles by product and service, industry sector, and market. These specialists support trade missions, trade fairs, and marketing seminars. The web site offers a variety of information and is organized by programs and seven major industry sectors: Basic Industries; Environmental Technologies; Information Technology; Service Industries and Finance; Textiles, Apparel and Consumer Goods; Tourism; and Transportation and Technology. The U.S. and Foreign Commercial Service (US&FCS) has a global network of specialists that assist U.S. exporters in more than 220 cities located in the United States and 92 foreign countries. The US&FCS web site offers companies a range of export services and information and the ability for the businesses to contact US&FCS directly by providing office staff, location, and directions. Each of these ITA units use electronic government in varying ways to help accomplish its mission.

As shown in Figure 1, ITA's web presence consists of many sites in headquarters and the four units—IA, MAC, TD, and US&FCS. For the purposes of this review we are defining a web site as a group of pages under a unit or office's responsibility.

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[6]The mission of the Import Administration, the fourth unit, is enforcing laws and agreements that help prevent unfairly traded imports from entering the United States.

Figure 1: ITA's Web Presence

ITA Web Sites*
http://www.itadoc.gov

Headquarters
(11 office web sites)

IA web site
http://www.ia.ita.doc.gov
- IA Homepage
- About IA
- Antidumping and Countervailing Duty Statistics
- Document Library
- Federal Register Notices
- Foreign Currency Exchange Rates
- Foreign-Trade Zones Board
- Remand Determinations
- Global Steel Trade
- Monitoring Imports to China

(18 office web sites)

MAC web site
http://www.mac.doc.gov
- MAC Homepage
- Africa
- American Management and Business Internship Training
- Business Information for Newly Independent States
- Central and Eastern European Business Information Center
- North American Free Trade Agreement
- Office of Japan
- Special American Business Internship Training Program
- Trade Compliance Center

(9 office web sites)

TD web site
http://www.ita.doc.gov/TD
- TD Homepage
- Advocacy Program
- Aerospace
- Basic Industries
- Chemicals
- Computers
- Consumer Goods
- Export Finance Matchmaker
- Industry Consultations Program
- Medical Equipment
- Office of Finance
- President's Export Council

(36 office web sites)

US&FCS web site
http://www.USAtrade.gov
- US&FCS Homepage
- Alaska, Arizona, Baltimore, Chicago, and other Export Assistance Centers
- Commercial Service Australia, Bangkok, Belgium, Japan, Showcase Europe, and others
- E-expo USA
- International Buyers Program
- Matchmaker Trade Delegation Program
- National District Export Council
- Trade Fair Certification Program

(38 office web sites)

*Not all points of entry identified by ITA internal documents are listed. Click on the unit site to find all sites.

Source: *Creating New ITA Web Presence to Develop More Effective Customer Relationships*, June 2000 internal review

The OIG has addressed information technology and web site issues in a number of evaluations and inspections of ITA's programs and operations. In a broad review of ITA's management challenges in export promotion, better use of information technology to improve both its in-house operations and programs, and the delivery of its products and services to U.S. firms, were identified as issues that needed to be addressed. During our inspections of US&FCS overseas posts, we found a number of web sites that required attention. For example, the US&FCS Germany web site was out of date and missing features to make it more useful and effective; the US&FCS Brazil web site lacked key industry information and relevant links; and, US&FCS Hong Kong was not using the Internet as effectively as it could have to promote its services and coordinate with multipliers.[7]

On-line export information and services are not limited to ITA. Numerous other Commerce agencies also play important roles in promoting trade. For example, the National Institute of

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[7]*Management Improvements Needed to Better Prepare for the Export Challenges of the 21st Century,* IPE-9904, March 1999; *US&FCS Germany: While Generally Productive, Its Priorities, Resources, and Activities Require Reassessment*, IPE-9287, July 1997; *US&FCS Brazil: Improvements Needed in Program Management and Internal Controls*, IPE-10916, September 1999; *US&FCS Hong Kong is a Strong Operation With Minor Management Issues*, IPE-11330, January 2000.

Standards and Technology helps U.S. firms become more competitive globally through its work on domestic and foreign standards and measurements, and the Bureau of Export Administration licenses the export of commodities that have both commercial and military uses. Other Commerce agencies provide varying degrees of assistance and support in the area of international export policy and promotion. It is no small challenge to present export information generated by all these entities in a customer-friendly manner.

Commerce's efforts to coordinate the regulation and promotion of exports across 19 federal agencies is accomplished primarily through the Trade Promotion Coordinating Committee (TPCC), which is chaired by the Secretary of Commerce.[8] The involvement of all these federal agencies reflects both the complexity and the importance of international trade in helping maintain the overall health of the economy. The TPCC is the obvious group to oversee the coordination of on-line federal trade and export promotion information.

As information technology and the Internet alter the way the government does business, the use of this new medium to attain mission goals must take into account existing and new federal laws. Two new laws, the 1998 Government Paperwork Elimination Act[9] (GPEA) and Section 508 of the Workforce Investment Act (usually referred to as the 1998 amendments to the Rehabilitation Act),[10] as well as the Paperwork Reduction Act,[11] all impact web site development efforts. GPEA requires that federal agencies provide as much on-line, as practicable, by 2003. Section 508 of the Rehabilitation Act requires federal agencies to ensure that the technology is accessible to people with disabilities. Thus, government agencies must ensure that information on their web sites is available in a format that is accessible to people with particular impairments, such as providing on-line forms that can be used with assistive technology or an equivalent accessible option. The Paperwork Reduction Act requires that information collection activities be approved by the Office of Management and Budget (OMB) and that the public is provided with information about the collection, regardless of the medium used.

It should be noted that the U.S. government is not necessarily the world leader in using the Internet to provide services to the public. The percentage of interactive services offered on-line to the public by the French, Australian, and Canadian governments is higher than that of the United States. As businesses and the public ask more from the government, ITA, like the rest of the U.S. government, must rise to the challenge and explore new ways to meet citizens' needs.

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[8]Refer to Appendix C for a list of the agencies in the TPCC.

[9]Public Law No. 105-277, Div C, tit. XVII.

[10]Public Law No. 105-220.

[11]Public Law No. 104-13.

OBSERVATIONS AND CONCLUSIONS

**I.   Recent Efforts Have Improved the Look, Feel,
          and User Friendliness of ITA Web Sites**

ITA made the initial decision to let its offices place their own information on the Internet, resulting in a proliferation of unit and office web sites with export information, rather than centrally controlling and thereby restricting site information. Thus, ITA's web presence consists of, according to internal ITA documents, 112 separate points of entry (see page 3). This bottoms-up approach resulted in some excellent sites produced by the various units containing useful information, for those willing to devote considerable time searching for it. However, it also resulted in an overall ITA web presence that lacked coherence, thereby necessitating many clicks of the mouse by the customer to find relevant information. This practice generally discourages customer use. It also resulted in undue duplication, the existence of over 100 unit and office sites serving as points of entry, 16 search engines, and a confusing organization of information and services. Each office organized its information differently, and finding information from the ITA home page was difficult because it was organized by unit. An unintegrated web presence of this sort cannot meet emerging customer expectations—which tend to be set by the private sector—where finding information with three clicks of the mouse is about the norm.

Recognizing that increasing customer sophistication and expectations required better organization, ITA has taken a number of positive steps in the last two years that have substantially improved the coherence of its web offerings. Table 1 below summarizes four of ITA's web sites that provide improved access to export information.

Table 1: Characteristics of Four Customer-Oriented ITA Web Sites

	TIC site (tradeinfo.doc.gov)	**US&FCS site (USAtrade.gov)**	**ITA home page (trade.gov)**	**Export Portal (export.gov)**
Scope of content	TPCC-wide content	US&FCS-wide content	DOC-wide content	TPCC-wide content
Customer Focus	Provides and links to export information and is the first stop for answers to trade-related questions	Provides an in-depth global resource for the (non-agricultural) export-ready exporter	Provides introductory and in-depth resources for the non-agricultural exporter and links to export.gov.	Provides links to introductory and in-depth resources for all U.S. exporters
Time in operation[a]	6 years	Less than 2 years	Less than 6 months	Less than 3 months, not fully expanded
Owner	TD/TIC	US&FCS	ITA portal task force	ITA portal task force

[a]As of December 2000.

The Trade Information Center's (TIC's) web site was one of the first sites to focus on customer needs. The TIC, housed in TD, posts information from export assistance programs across the government and is often considered the first stop for trade-related assistance. The TIC responds to trade questions via a toll-free telephone number, e-mail, and fax, all of which are noted on the web site. Most ITA units, and even one non-Commerce site,[12] refer inquiries from new-to-export companies to the TIC. According to one TIC official, in the past year the Center responded to over 75,000 questions, not including e-mail requests for information. With this volume of customer interface, the staff understands what trade information to post on its web site that will best address U.S. business needs. The TIC emphasizes linking to information where possible, rather than recreating it, although some "repackaging" is occasionally done.

Over the past three years, US&FCS has streamlined and considerably improved its web presence. Initially, a number of the 262 US&FCS domestic and foreign offices created their own office web site, resulting in duplication, differences in content and format, and a lack of continuity and consistency from office site to office site. US&FCS consolidated its web presence by centralizing web site development, standardizing site format, and placing one logo and banner on all US&FCS web pages. The consistent format permits web site users to easily link to the desired market research for a country or industry, services, trade events, and other resources. General clarity and navigability, or ease of use, is considerably aided by the common format. In addition, the logo and banner provide a common identity across the US&FCS web site, often referred to on the Internet as "branding." The US&FCS e-commerce task force is responsible for improving, coordinating, and managing US&FCS's web presence.

Despite the early accomplishments made by the TIC and US&FCS to improve their sites, until recently, the ITA home page listed a confusing mix of individual office and program web sites. To address this problem, in June 2000, ITA contracted with a consultant to examine ITA's web presence, and created an ITA portal task force, led by the special assistant for the Under Secretary for International Trade. The major accomplishment of the task force has been to rearrange the information by topics, rather than by organizational unit or program. The creation of the portal task force and strong high-level support for improving ITA's web presence were motivating factors for the recent web site changes.

The new ITA home page is a major entry point and is intended to guide users easily through the web site. The ITA home page takes pre-existing web site content and services and brings them together by listing the links to the sites under headings, much like the yellow pages in the telephone book lists businesses by subject. The home page also provides links to other export-related web sites in the Department, such as the Economics and Statistics Administration's

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[12]The Small Business Administration's Tradenet export advisor portal.

STAT-USA, the Bureau of Export Administration, and the Minority Business Development
Agency. For example, for those seeking information on exporting fish products and aquaculture,
a link is provided to the National Marine Fisheries Service, located in the Department's National
Oceanic and Atmospheric Administration. The banner also provides uniformity, or "branding"
across ITA's web presence.

The task force also created an export portal that more fully emphasized the entire Department's
role in exporting. However, the scope of that portal project was expanded, at the request of
Departmental officials, to include federal-wide export information. The export portal will
provide a single government-wide point of entry, incorporating relevant information from the
TPCC agencies, and will carry a TPCC banner. For instance, the site will include financing
information from the Export-Import Bank, as well as regulatory information on agricultural
exports from the Foreign Agricultural Service. The export portal was launched in September
2000 and continues to undergo modifications.

Both the ITA home page and export portal are "intentions-based," meaning that information is
organized around the user's needs rather than around the agency's organizational structure and
function. The new ITA home page provides entry to ITA unit and office sites by anticipating
questions the user might ask. The customer "intentions" were developed internally by ITA and
are intended to be a user-friendly way to find information. Both the home page and the portal are based on the five intentions, shown in the box, under "Get International Trade Assistance," on the left hand side of the screen in Figure 2. The home page and portal are real steps forward in organizing the wealth of government information on exporting. ITA worked with the consultants to diagnose the existing web sites, reorganize ITA's home page, create the export portal, and plan for future enhancements.

Figure 2: ITA's Home Page

While the home page and portal are easy to comprehend, and improve site navigation, they
constitute a change only to the surface of ITA's web site. Once users click a few times through

the intentions section of the site, they quickly discover that information continues to be scattered across office-maintained pages. Using portals is analogous to bringing together a number of separate libraries under one roof. One can now get to each library with greater ease, a considerable improvement, but this is not the same as thoroughly integrating the collection into a single library with the same indexing system. The new home page and export portal may draw customers into the ITA or federal export web sites, but many will still be frustrated if the ITA home page and export portal and the entire web site are not integrated more deeply and comprehensively. Although the home page and portal are impressive improvements, they should be seen as first steps, and part of a long-term cumulative renovation and integration of ITA's web presence.

The initial review of the ITA web sites and the creation of the new home page and portal constituted the first phase of the project. The second phase, which began in October 2000, was to determine a web governance structure, establish ITA-wide Internet standards and performance expectations, and eliminate duplication. The task force is currently working with the consultants to revise and edit customer intentions and complete the export portal. They have also been discussing appropriate web-based tools and other methods to increase the functionality of ITA's home page and the export portal, such as creating common platforms and obtaining a powerful search engine.

Although there has been progress, and ITA has taken steps to deliver on-line information and services based on user—rather than organizational—needs, much more needs to be done. This is recognized by ITA officials and staff who have served on the portal task force. To assist this effort, we present the findings of our review in the following sections.

II.   Coordination Is Needed to Better Integrate Internet Efforts

Clearly users can be overwhelmed by the amount of information on the Internet. Ideally, the goal of any web site is to enable users to find the information they want with the fewest clicks. Thus, it becomes critical for organizations to assemble and categorize web site content in a way that allows users to quickly access needed information. This can only be accomplished if all of the organizations with content expertise work in a coordinated fashion. Both within ITA and throughout the federal government, more needs to be done to ensure ongoing, long-term coordination of Internet efforts to best meet users' needs.

A.   *Better coordination of ITA's web efforts is needed*

ITA's home page was reorganized to provide easy access to all of ITA's on-line information. However, we found that, within ITA, information is duplicated and inconsistently offered, leaving some sites rich with content and data, and others with gaps in coverage. We also found the inconsistent use of terms across the web site to be very confusing.   This is occurring because ITA units are not working together to provide customers with the best, most complete information available. All of these problems tend to leave users frustrated and confused.

Duplication exists across ITA's web sites

We found a number of areas where information is duplicated across ITA web sites. For example, at least five industry offices in TD, two offices in MAC, and the US&FCS trade opportunity database[13] provide on-line trade leads. Most of the sites include the leads from the US&FCS database, as well as a mix of other public and private sector leads. The duplication of trade leads wastes government resources and is confusing for users, who may have to visit five or more different office web sites to obtain all available leads. The following table illustrates other examples of duplication on ITA's web sites.

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[13]The trade opportunity database is composed of leads gathered by the overseas staff during conversations with local buyers, at trade shows, and through local market research.

Table 2: Duplication of Information on Web Sites

| Export Information/Products | Number of web sites found with information[a] in: | | | | *Total* |
	TIC	MAC	US&FCS	TD	
Trade Missions & Events	✓	✓✓✓	✓✓✓✓ ✓✓✓	✓✓✓✓ ✓✓✓✓✓	*20*
Country Market Research (e.g., China)	✓	✓✓	✓✓	✓✓✓✓ ✓✓✓✓	*13*
Country Commercial Guides		✓✓✓✓	✓	✓✓✓	*8*
Industry Market Research (e.g., Information Technology)		✓✓	✓✓	✓✓✓✓	*8*
Trade Leads		✓✓	✓	✓✓✓✓	*7*
Trade Agreements		✓✓[b]		✓✓✓✓✓	*7*
Tax & Tariff	✓	✓✓		✓✓	*5*
Policy (e.g., NAFTA)	✓	✓✓		✓✓	*5*

[a] The chart includes posted information and does not include links to information.
[b] The chart includes posted agreements and does not include sites devoted specifically to a single agreement, such as the home page for the North American Free Trade Agreement or the Caribbean Basin Initiative.

Each office site, represented by a check mark, contains information about the topic listed on the left. We included only the sites where the office posts its own material, and excluded offices that merely provide links to the information. This duplication has occurred because each office takes responsibility for placing content on the site with little or no external coordination. To avoid wasting resources and confusing its customers, ITA should consolidate similar information into a single database.

For example, within US&FCS, all trade events are now in one searchable database. Previously, the official database maintained by the events office captured, by one account, only 25 percent of US&FCS's events. The new database allows all domestic and overseas offices to list local events, and includes both certified and uncertified events. Of course, not every office is utilizing the new data base and a number of office sites, such as the Multi-State Catalog Exhibitions site and Showcase Europe, continue to maintain separate calendars. The next step should be to coordinate all of ITA's trade events and missions into a single database. For those areas where, unlike trade events, information cannot be reasonably consolidated or is already in a database, such as the Trade Compliance Center's trade agreements database, better use of linking to that information should be utilized.

Web site information needs to be consistent, comprehensive, and better linked

We found that many of the unit and office web sites, accessed via the ITA home page and export portal, vary in the types of information offered. For example, within TD, most of the industry offices offer a mix of different information in different formats. Rather than determine common information needs across all industries, each office designs and decides what information to post

for its industry sector. As a consequence, most of the industries differ visually, in the type of information offered, and in the content of the materials.

Figure 3: Information Listed on Three Industry Sites

Figure 3 displays the information a user finds on the home pages of three industry sites: Environmental Technologies, Textiles and Apparel, and Energy. Both the information offered and the look of the sites vary significantly. This makes it difficult for users to compile and find multisector information across industry pages. For example, although each site provides trade statistics—referred to as trade data on the Textile site—the information provided differs. The Environmental Technologies site links the user to the Office of Trade and Economic Analysis, the Energy site provides the user with a chart for U.S. energy imports (not exports) for the years 1994-99, and the Textiles site contains a database that allows users to access import and export reports in a variety of ways. In addition, while some sites are rich with information, others are not.

While there may be justification to cover some industries more extensively than others, we believe there should be a minimum baseline of information across all industries and a similar format for finding and retrieving information. ITA should determine what industry information a user is most likely to need from the Internet—such as trade statistics, a list of "key markets" per industry, and links to the relevant trade associations—and ensure that all industries provide that information in a consistent format.

The MAC site is a mix of programs (e.g., internship programs for Northern Ireland and the former Soviet Union, export promotion programs for the newly independent states and central and eastern Europe), trade polices (e.g., North American Free Trade Agreement (NAFTA), U.S.-Caribbean Basin Trade Partnership Act of 2000), and country information (e.g., Japan, China). For some of these sites, the program might be more useful and accessible if the information was associated with country or regional information. For example, an exporter seeking information on Ireland may find the internship program useful, or someone seeking

information on trade with Mexico might find the NAFTA information useful. Incorporating information by region, country, or industry of interest would help users find information more readily. At a minimum, better use of links should be incorporated across ITA web sites to assist the user in finding all relevant programs and information.

Unlike MAC and TD, US&FCS began to internally coordinate and consolidate its web site information, beginning over two years ago. This effort included a moratorium on new field office web sites during fiscal year 2000. The consolidation effort has resulted in a site that consistently provides information about the staff, location and directions, and local events for all international and domestic offices. Field offices have the ability to post unique regional information and events as well. US&FCS created an e-commerce task force, with a dedicated staff, to make the web site changes. The task force has also undertaken a number of initiatives, including the consolidation of event information and pilot-testing new initiatives, such as an e-mail subscription service for market information. The use of a dedicated staff to coordinate and integrate services and information products has been successful for US&FCS and should be considered elsewhere in ITA. Given the existence and experience of the current task force, a small increase in funding could enable it to take on projects with a broader ITA-wide scope.

<u>Web site terminology is inconsistent</u>

Different offices use different terminology on ITA's web sites. This is very confusing. For example, ITA web sites contains multiple, differing industry lists. Specifically, on the US&FCS site, a user encounters 114 industry products and services to choose from, while on the TD home page, 20 broad industry categories are listed. MAC lists 16 industries on the Business Information Service for the Newly Independent States site and 15 on the Central and Eastern Europe Business Information Center site. Among other offices, TD's global infrastructure database lists projects in 21 unique categories, while MAC's Trade Compliance Center lists 58 industries. Yet none of the industry lists are a subset of another list, and users do not know whether industry categories are equivalent across ITA web sites. While some offices may have to provide options that are not universal to all of ITA—such as the Trade Compliance Center industry list that includes options for agricultural agreements—until common terms are used across ITA sites, users must spend considerable time and effort in assessing the choices every time a new office site is visited. For example, the construction industry is listed under "construction and real estate" on the BISNIS site, "forest products" on the TD site, and several options on the US&FCS site, including "building products," "construction equipment," and "housing products." In addition, it can be difficult to associate some of the industries listed on one site to the industry choices on another site. For instance, there are no choices on the US&FCS industry list that correspond to the TD Environmental Technologies industry sector.

For users, working with a common set of terms across ITA sites assists with navigating and finding information. For ITA, establishing a universal set of terms to describe the information on

the Internet will ultimately assist with managing content. As information on web sites increases in volume, complexity, and timeliness, and the number of contributors multiplies, the importance of managing content becomes increasingly critical. The first step to manage content is to identify how information will be classified and categorized. According to the Knowledge Management Working Group of the Federal Chief Information Officers' Council, creating a thesaurus and enforcing its use helps users to better find information and organizations to better manage it.[14] By categorizing and managing content, users of ITA web sites would be able to build a personalized page based on the data categories and perform more detailed searches. Moreover, ITA could design an automated system to archive information beyond a designated date to keep the site from becoming crowded with extraneous or outdated material. At a minimum, a single set of data elements should be defined and used by all components of ITA—if not all federal agencies—involved in export promotion and international trade.

A web governance board could facilitate coordination within ITA

ITA has a history of poor coordination, as identified by the OIG in the past[15] and reaffirmed both by this review and the consulting firm that ITA hired to assist with its web site development efforts. While ITA coordination has improved for certain aspects of the portal project to date, ITA faces a number of challenges, including better coordination of office sites within organizations, such as the industry sectors in TD and across all of ITA.[16] This coordination is going to require the expertise of both program specialists and information resource experts. The collaboration between program and technical experts is necessary to achieve a customer-focused web presence. We, like the consulting firm, recommend that a permanent web governance board be created to oversee ITA's e-government initiatives and Internet efforts.

A number of models for governance boards exist. For example, the Energy Web Council of the Department of Energy was created by the Chief Information Officer's (CIO) office to "further agency-wide communication, coordination, and assessment of industry and public trends

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[14]*Management Knowledge @ Work: An Overview of Knowledge Management* (draft), Knowledge Management Working Group of the Federal Chief Information Officers' Council, October 4, 2000. The CIO Council serves as the principal interagency forum for improving practices in the design, modernization, use, sharing, and performance of federal government agency information resources. The Knowledge Management Working Group brings together guidance on the content, process, and technology needed to ensure that the federal government makes full use of its collective knowledge, experience, and abilities.

[15]*Management Improvements Needed to Better Prepare for the Export Challenges of the 21st Century*, IPE-9904, March 1999. *Assessment of Commerce's Efforts in Helping U.S. Firms Meet the Export Challenges of the 1990s*, IPE-4523, March 1993.

[16]Although the Import Administration is not part of this review, it should be included in any cross-cutting efforts to improve ITA web sites.

regarding use of the web as an information resource."[17] The Council, which is co-chaired by Energy's CIO and the Director of Consumer Information, consists of 12 program experts responsible for content issues, 6 operations experts from the CIO office and Consumer Affairs office, and 11 contributing members from other, mostly administrative, areas. In addition to the Council, there are two standing committees, one on e-commerce and advanced applications and another on public feedback/audience focus. The Council meets monthly and submits a yearly report to the Energy Deputy Secretary on progress made and lessons learned. One official from Energy stated this model has worked well for coordinating its web efforts. Regardless of the model chosen, ITA should create a web governance board to help eliminate internal duplication and ensure that web development efforts organize information around customer requirements.

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In response to our draft report, ITA stated that the creation of a Web Governance Council was proposed in August of 2000. However, due to the delay in filling several key leadership positions, seven months have elapsed and the Council has yet to be created. Once the Council is officially established, we request that ITA provide us with the Council charter and an explanation of how the problems we encountered will be addressed.

ITA did not fully address whether, in addition to the US&FCS task force, a second application group would be created or whether the existing task force would be moved under the CIO's office, or left in US&FCS and expanded. The response only stated that ITA is in the process of forming a CIO's office, which along with the ITA Web Governance Council, will take over the function of coordinating and consolidating ITA sites. ITA's action plan should address this issue.

B.   ITA needs to formalize its coordination of web activities with the Trade Promotion Coordinating Committee

ITA is currently soliciting input from an ad hoc working group of TPCC representatives to help ITA expand the government-wide version of the export portal. This is the second government-wide export portal built. To ensure that there is only one official export portal, ITA should obtain the TPCC's commitment to a single government-wide portal and formalize the TPCC working group into a board to govern web site development and maintenance.

In 1997, the Small Business Administration (SBA) developed a cross-agency web site for

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[17]Web Council charter, http://www.energy.gov/webcouncil/charter.htm.

international trade,[18] Tradenet, as part of a governmentwide initiative.[19] Over $400,000 in interagency funds were used to create the Tradenet site, and input was widely sought from Commerce and other export promotion federal agencies and groups, such as the International Trade Data Network. Feedback was also gathered from businesses and other users in a number of focus group sessions. It was from the focus groups that SBA learned, for example, that customers prefer to conduct local resource searches using postal ZIP codes. In addition, many of the ideas for the portal were modeled after the Foreign Agricultural Service web site.

The Tradenet portal has considerable functionality, including the ability to search for contacts by ZIP code, the use of technology to pull trade leads from multiple sites, and a customizable home page that allows users to organize the site according to their interests and return to the site for quick updates. This last feature is especially important for small businesses which do not have the staff to constantly track information.

Despite these features, a good design, extensive links, and testing, the Tradenet portal has been hampered by a number of problems. Neither the National Partnership nor SBA is providing sufficient support for ongoing maintenance, updating, and development of the site. Furthermore, there has never been sufficient buy-in from ITA because Tradenet has been viewed as an SBA site, according to officials from both agencies. These factors have contributed to the site's relative lack of visibility. Given these problems, the SBA project manager has suggested that Commerce take over the Tradenet portal. However, ITA has resisted taking over Tradenet, preferring to build its own. At present, both the export and the Tradenet portals remain on-line, with each portal linking to the other.

Despite the fact that the export portal currently lacks a search engine and much of the functionality of the Tradenet site, ITA intends for the export portal to become the primary export promotion web site in the federal government. According to ITA officials, Commerce ownership makes sense since the Department provides 80 percent of all export information, currently answers all Tradenet-generated questions via the TIC, and chairs the TPCC. The export portal also has the backing of the President's Management Council, which has championed other major

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[18]This site can be found on the Internet at www.tradenet.gov.

[19]Tradenet was sponsored by the National Partnership for Reinventing Government's Access America initiative. The National Partnership for Reinventing Government, formerly the National Performance Review, was an interagency task force designed to help the government become more efficient, with an emphasis on putting customers first. The goal of the Access America initiative was to reengineer processes through information technology.

web initiatives, such as the U.S. government's one-stop portal, FirstGov.[20] Nonetheless, ITA's creation of the export portal represents a duplication of resources and effort that could have been avoided had there been better coordination within the TPCC from the outset.

While there has been recent cooperation creating the export portal, there needs to be buy-in and commitment from all the trade-related agencies to develop the site further, remove duplication, adopt common standards, and promote technical, visual, and content coherence of web sites across agencies. To fully exploit the potential for economy and efficiency inherent in information technology and the Internet, TPCC agencies should move to integrate services and provide "one-stop shopping" for companies and the public. In the future, citizens should be able to log on to one government web site and easily find the export or trade services for which they are looking. Ideally, export and trade agencies should be able to agree on a common set of information to be submitted once by companies. For instance, a business needing loans or financial credit guarantees from the Export-Import Bank, regulatory information from the Foreign Agricultural Service, or trade leads from ITA would fill out one web-based form. The information would be forwarded to all necessary federal—and even state and local—trade agencies, saving time, money, and frustration at all levels. While the Internet makes such efficiencies feasible, many definitions, rules, and business processes would have to be brought into far better alignment across agencies to make such integrated services workable.[21]

To ensure that the TPCC export portal efforts are able to exist on a long-term basis, a more formal committee structure than the ad hoc working group of the TPCC is needed. Such issues as uniformity, maintenance, and standards will require resolution. In addition, continuing TPCC leadership and coordination are needed to achieve the efficiencies associated with cross-agency integrated delivery of services. ITA should take the lead in formalizing the TPCC web site committee and obtaining commitment of resources from all relevant agencies.

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ITA's response states that it has already obtained the commitment of the TPCC on the working level to a single, government-wide export portal. According to ITA, an informal working group is integrating the TPCC agency programs into the export.gov web site and that once that task is

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[20]FirstGov provides links to all online U.S. Federal Government resources. The web site address for this site, as well as others mentioned in this report, can be found in Appendix A, page 42.

[21]Robert Atkinson of the Progressive Policy Institute estimates that more than 100 federal organizations make the rules and control the permits required for importing and exporting and have, among them, "more than 2,000 different definitions for a set of about 130 data elements that reflect the basic trade data requirements of federal agencies." See William Mathews, "Setting A Course for E-government," *Federal Computer Week*, December 12, 2000, http//www.fcw.com/fcw/articles/2000/1211/cov-egov.

completed, a formal TPCC Export Portal Working Group will be established. ITA also stated that the SBA export portal and the ITA export portal will be consolidated into a single export portal. This was not the case at the time of our review, and we applaud both SBA and ITA for working together to create one government-wide export portal. ITA also stated that the lack of buy-in for Tradenet had to do with the poor maintenance of the site and lack of visibility. ITA also denies that it resisted the concept of taking over Tradenet. Whatever the reason for ITA's lack of buy-in during our review, there was never any indication that taking over and improving the Tradenet portal was considered. A June 9, 2000 proposal (*Creating a New ITA Web Presence to Develop More Effective Customer Relationships*) clearly indicates that the web project objective was to "improve **ITA's** web presence to the customer," "**create** an integrated 'point-of entry'/**ITA-portal** for exporters," and "**link** with DOC and TPCC web efforts that strengthens ITA's role in export assistance." [bold and italics added] The outcomes were to "develop an ITA Homepage/Exporter Portal" and "make recommendations of long-term web capabilities." Moreover, on numerous occasions the OIG was told by ITA officials that ITA was tasked by Departmental management to develop its own export portal.

III.   Better Planning Is Essential to Provide More Products and Services On-line

ITA is already providing a considerable number of on-line products and services. However, many more still need to be made available to the customer on-line. In addition, a few of ITA's on-line products and services need further refinement or broader application designed to utilize the latest advances in technology. ITA's planning for on-line products and services has not been thorough, to date, causing some activities to be overlooked and not offered on-line. As a result, users are unable to interact with ITA in the most efficient and timely manner, and they may lose potential business opportunities. As ITA begins to place more of its products and services on-line, old, perhaps inefficient paper processes from legacy systems should not automatically be converted into web-based applications. Rather, new methods, that incorporate technological advances, should be explored in order to more efficiently and effectively provide ITA products and services.

In the near future, federal agencies will provide more products and services on-line. In doing so, agencies must also take into account other laws and regulations that affect such Internet-related issues as information collection restrictions, accessibility issues, and privacy concerns. Nonetheless, the 1998 Government Paperwork Elimination Act requires that five years after the bill is signed, federal agencies, when practicable, provide (1) "the option of electronic maintenance, submission, or disclosure of information....as a substitute for paper," and (2) "the use and acceptance of electronic signatures." Under GPEA, OMB is responsible for ensuring that federal agencies meet the October 21, 2003, implementation deadline. All federal agencies were required to submit GPEA implementation plans to OMB by October 31, 2000. These plans were required to include an assessment of the practicability of submitting information and maintaining records electronically and of using signature technologies.

A.   *Activities that are not on-line should be put on-line, or ITA should fully explain why they are not on-line*

Providing a product or service often requires collecting information from the public, a task that has traditionally been handled through paper applications, questionnaires, and other types of forms. Although ITA has more than 30 official information collection activities, many of these activities are not offered on-line to customers. For example, several forms can be downloaded and printed, but cannot be filled out by the customer, or submitted to ITA on-line. These include the application for the market development cooperator program, the application for an internship at the advocacy center, the form to order publications from TD's Office of Textiles and Apparel, and the pre-gold key service questionnaire. During its planning activities, ITA should consider how programs can take greater advantage of the Internet and information technology, and enable the user to provide and submit information on-line. In many instances, this will require a critical rethinking and redesign of the current processes.

Another part of the on-line planning process is how information will be provided to the public. However, ITA's planning effort does not consider information dissemination. In fact, ITA's GPEA Implementation Plan includes only information collection activities, and not information dissemination activities, as required by OMB. For example, the plan did not include the new on-line customized state export information, a highly graphical and user-friendly data base that allows users to view state and global exporting patterns. And there is no mention on the US&FCS web site of the services and short and long-term rental space available to U.S. business at the U.S. Commercial Centers located in Brazil, South Africa, China, and Indonesia or the U.S. Trade Center in Mexico. While planning for on-line products and services, ITA needs to consider both information collected and disseminated, and how to exchange information or communicate with its customers in the most efficient and effective manner.

In addition, ITA rarely conducts on-line payment transactions. We found only found two offices that accept credit card payments on-line, yet ITA collects payments for a number of activities, including trade missions and events and the numerous export services offered by US&FCS. ITA needs to consider offering more interactive products and services, including on-line payments.

Finally, there may be circumstances where it might not be appropriate for some products and services to be on-line. OMB requires that agencies include information collections, interagency reporting, information dissemination, and other agency identified transactions in the GPEA implementation plan. For activities that are not going to be automated by October 2003, OMB requires that the agencies fully explain why in the plan. We found that ITA's planning activities, such as the GPEA plan, did not address products and services that are not going to be on-line. In the event that some activities will not be placed on-line, ITA needs to articulate the reasons why in its plan.

Rather than just automate the current methods used for providing information and services, ITA should undertake a fundamental rethinking and redesign of its products and services that not only helps it meet the 2003 deadline, but also, hopefully, achieves improvements in cost, quality, timeliness, and service. This may result in eliminating old processes and systems and developing new ways to obtain and disseminate information or provide services. The recent US&FCS initiative to provide the participation agreement[22] electronically is an example where the paper form was not only automated, but the entire purpose for collecting the information was reviewed. Specifically, the information collected with the automated agreement is linked with the on-line collections function, allowing collections and outstanding payments to be easily monitored. Thus, when a business agrees to participate in a trade promotion activity, the company

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[22]The Participation Agreement is an OMB-approved form that is the vehicle by which individual U.S. firms agree to participate in ITA's trade promotion program. The agreement identifies the products and/or services the business intends to sell or promote and records the required financial contribution. It also represents a contractual agreement between the company and the U.S. Department of Commerce.

information and payment due are tracked for collection purposes.[23] This is an excellent on-line activity that will save ITA and its customers time.

B.   *Opportunities for new on-line products should be considered*

ITA's implementation plan only addresses placing existing information collections on-line and does not identify any new on-line products and services. ITA needs to plan for and expand the usefulness of its web presence by providing new on-line products and services to its customers.

An example of an on-line product not currently offered by ITA is one available to Australian exporters from the Australian Trade Commission (Austrade). This product, called a "Partnership Self Assessment," helps exporters assess the strengths and weaknesses of their current international business partnerships in South East Asia. The on-line questionnaire takes into consideration such factors as the sales growth of the product/service, profitability of the relationship, competitive market advantage, market share, strategic gains in the market involved, and the overall performance. A graphical representation of how well the partnership is performing and strategies to maximize partnership success are provided to the exporter.

In addition, there is a on-line trend to provide customized information. Team Canada Inc, a program under the Canadian Trade Commissioner Service, will soon allow user customization by adding a tool that will organize and classify information into categories and subcategories, much in the same way that some private sector sites offer. The Australian Trade Commission already provides this service to Australian exporters. Moreover, the Canadian web site will also include a notification tool that will automatically inform users of changes to the content in those areas of interest identified by them. We noted several other web sites that offer customization in our list of recommended web sites in Appendix A.

During its planning effort, ITA needs to consider offering new on-line products and services, such as the partnership assessment product and customization.

C.   *Improvements should be made to existing on-line activities*

We also noted that several on-line activities were useful, but not widely utilized, and other on-line efforts needed some improvements. For example, the US&FCS "contact request e-form" is an excellent tool for customers to contact U.S. Export Assistance Centers 24 hours a day and for trade specialists to understand customer needs before calling the customer. The form collects

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[23]Unfortunately, until the Department gives its approval for on-line signatures for this type of agreement, information will be internally filled out by staff, rather than participants, and entered into the trade events system. The Department's CIO office is meeting regularly with departmental and other federal officials to implement an electronic signature program by the end of 2001.

information from a company about its business and its preferences for US&FCS services. However, we found that the contact request e-form was being used by only two Centers. It may be that this type of form could be widely employed throughout US&FCS and ITA. During its planning activities, ITA should explore implementing an on-line form, similar to the US&FCS contact request e-form, for all ITA offices that assist U.S. exporters.

ITA's effort to provide on-line subscription services also needs to be reviewed and refined. The table below identifies five on-line subscriptions we found across ITA's web sites.

Table 3: Five On-line Subscriptions on ITA's Web Sites

Subscription Service	Subscription Explanation and URL
Subscribe to BISNIS Products and Services	Based on user interests, MAC's Business Information Service for the Newly Independent States provides information by hard copy and/or by e-mail. http://www.bisnis.doc.gov/bisnis/data/bismail0.cfm
Export IT ALERT!	TD's Office of Information Technology provides trade events, information, and research by e-mail. http://exportit.ita.doc.gov/
Mailing List	TD's Office of Environmental Technologies provides information about upcoming trade events, market research, publications, and the office newsletter by hardcopy and e-mail. http://infoserv2.ita.doc.gov/ETE/ETEINFO.nsf/frmSubmit?Openform
TI News	TD's Office of Tourism notifies users of upcoming or updated data on international travel, new products and services that will be available on the Internet or for ordering, press related events, outreach services, and policy issues by e-mail. http://tinet.ita.doc.gov/tinews/subscribe.html
China Commercial Brief	US&FCS China provides weekly updates on China's industry and service sectors by e-mail. http://www.usembassy-china.org.cn/english/commercial/index.html

This is an example where the process for providing subscriptions, currently on an office-by-office basis, should be reassessed and reengineered. A central site that includes all subscription registrations would allow users to subscribe to several services and provide contact information only once, rather than supplying the same information across multiple ITA web sites. Centralizing services will make user interactions easier, faster, and less time consuming because they no longer have to discover ITA's multiple subscription services. ITA needs to consider coordinating and combining similar on-line products and services, such as on-line subscription services to minimize customers' efforts and expand its outreach.

In addition, we believe both the search capability for and display of trade leads need to be improved. The US&FCS trade opportunities program provides the most comprehensive list of country and industry trade leads. However, despite recent positive changes, the site could still use some improvement. For example, searching by country, a user must review every lead, 10 at

a time, to determine the product or industry, a very cumbersome process. One of the best trade lead sites we identified was in the Department of Agriculture's Foreign Agricultural Service. From the Service's home page, it only takes two clicks to find the on-line trade leads page. The site allows a search within a customer defined-time frame, or within a block of time, including past week, and past two years, and by key word, commodity type, and/or country. The display shows the date, product name, the internationally recognized classification system code, and country. ITA should be identifying ways to improve the trade lead program and other on-line products and services during its planning process for GPEA.

Many opportunities for on-line products and services were not identified by ITA during its planning process, and consequently were missing from ITA's GPEA Implementation Plan. ITA's on-line planning effort was narrowly focused on meeting the objectives of OMB, and lacked other essential information needed to make informed decisions about on-line activities. The Department's Office of the Chief Information Officer agrees and has instructed agencies to evaluate all transaction types, including information exchanged and disseminated.

ITA's plan must be more comprehensive, for web sites that do not offer an easy-to-find and easy-to-use array of products and services will discourage customers from returning. In addition, customers may not receive the information and services as quickly as they need to react to global business circumstances, thus losing potential business opportunities. An example of an extensive on-line action plan is the plan produced by the Australian Trade Commission. The Austrade plan identifies all of its products and services, and distinguishes between those planned for on-line versus off-line delivery. The Austrade plan also explains why a product or service is not going to be on-line, and identifies those off-line products that have potential for being on-line.

ITA's on-line planning approach should be a cross-cutting effort that evaluates all products and services, whether information is collected or disseminated. In doing so, ITA's plan should utilize the latest advances in technology that will streamline ITA's workload and make user interactions with the government easier, faster, and cheaper. In addition, because web technology changes so rapidly, ITA's on-line implementation plan should be updated annually, or as needed.

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ITA concurs with the recommendation to conduct a comprehensive review of its current and planned products and services. It has already taken some action toward improving its planning process for placing its information and services on-line. In its response, ITA also recognized the importance, and provided some examples, of redesigned business process initiatives. We request that ITA provide us with a copy of its updated GPEA plan.

IV.   Improved Mechanisms to Seek and Use Customer Feedback Are Needed

Feedback–both positive and negative–is key to understanding what is important to the customer. In fact, the single most important source guiding the development of a successful web presence is user feedback. Feedback allows the web developer to know how to revise content to better meet user expectations or learn how often a particular site or page is accessed. In the end, unless web sites are fully utilized, ideally by the target audience, it is a waste of resources.

ITA could be doing more to solicit and manage feedback from customers regarding its web presence.[24] The purpose for collecting feedback is to determine whether ITA's web sites are being looked at, are considered useful, or can be improved or added to. Moreover, user comments have the potential to save money and time for both the customer and ITA. We found ITA's process for soliciting feedback confusing and its method of analyzing feedback disorganized and haphazard. In addition, ITA is not fully utilizing all types of feedback mechanisms, such as focus groups and on-line requests for content feedback. We noted several criticisms from customers about ITA's web sites during our review. In part this has occurred because ITA has not emphasized the need and importance of obtaining input from the user. As a result, there is no formal guidance for requesting and using customer feedback.

A.   *Responsibility for managing customer feedback and maintaining web site accuracy must be formally assigned*

ITA is not managing customer e-mail feedback in a uniform manner. This includes both the collection of feedback, and the analysis of feedback, where there is no formal process for sharing customer information or responding to customer comments.

E-mail requests, comments, and suggestions come from a number of sources for various reasons. US&FCS solicits comments from users of its web site by providing a feedback form that is accessed via the banner that appears on every page. A review of 241 e-mail responses to the US&FCS web site shows the following breakdown: 24 percent were about site content, 21 percent were specific trade-related questions, 20 percent involved technical problems the user encountered on the site, 13 percent were from students requesting research information, 8 percent were from foreign companies interested in selling products in the United States, 6 percent were from companies wanting to sell something to US&FCS, and 8 percent were miscellaneous or unclear. This breakdown may not be the same for the other ITA web sites, but it is apparent that

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[24]In handling customer feedback, relevant laws must also be taken account. For example, to ensure there is no undue burden placed on the public, information collections are subject to the Paperwork Reduction Act and must be approved by OMB. In addition, the recently published final standards for Section 508 of the Rehabilitation Act require that federal agencies make on-line information collections accessible to persons with disabilities using assistive technology or make an equivalent accessible option available. (See page 36 for a discussion of both laws.)

one individual is not capable of responding to all of these different types of comments and/or inquiries. For example, the Trade Information Center responds to general trade questions quickly and efficiently, whereas web masters are best equipped to respond to technical issues and web site owners to answer content queries. Thus, directing e-mail comments to one person is often inefficient because that individual must in turn forward the e-mail to others, resulting in potential delays. In addition, it would be more efficient to inform non-ITA customers up-front, such as foreign companies seeking opportunities to import to the United States, where to go for information, such as the embassy in the inquirer's country, rather than waste the user's time writing the e-mail and ITA's time reading or responding to it.

ITA's new home page and export portal does a great job of directing the user to different contact points, depending on the question or problem. After clicking on a "contact us" button, the user has a number of options, including how to obtain media information, ask trade and export questions, and report technical problems. However, the use of frames, and subsequently the "contact us" page, were to be eliminated from ITA web sites, except the ITA home page. We believe that deleting the "contact us" feedback option would not be a positive change, as it allows the user to route comments to the individual or office best equipped to respond to the feedback. If the banner, which currently appears on every page of ITA's web sites, is eliminated, ITA should establish a policy requiring all units and offices to place a customer feedback option on their sites similar to the one that appeared on the portal banner. Providing users with the ability to direct comments to the appropriate contact within ITA is an efficient use of time for all.

An issue related to the collection of feedback is the departmental requirement that every office site provide an e-mail address for comments and inquiries. The purpose of the standard is to ensure that users of Commerce web sites are provided a way to contact the organization. Commerce allows organizations to establish their own policies and procedures for implementing this recommendation, although ITA has not done so. Most of ITA's web sites comply with this standard, providing a general office address or a specific staff person as a point of contact, usually at the bottom of the page. However, this could cause possible confusion for users who may want to contact ITA and are confronted with both a general e-mail address and the "contact us" option. ITA should eliminate one point of contact or explicitly state the differences between the various contacts, especially when multiple choices appear on the same page.

ITA also lacks a formal process for sharing and analyzing customer e-mail comments. While many different ITA web managers and trade specialists are using a variety of approaches for evaluating and sharing customer e-mails for most ITA web sites, there is no formal guidance for managing this diverse effort. For example, US&FCS customer e-mails are analyzed by two technical liaison web masters, while MAC's CEEBIC customer e-mails are answered by trade specialists, and TD e-mails are responded to by either a trade specialist or a web master. While using different approaches may not necessarily be wrong, it does indicate that the process for handling, reviewing, and sharing customer e-mails needs to be formalized. Without such a

formal process, the comments may not all be receiving the consistent, high quality attention that ITA desires. ITA needs to provide a formal approach for how the e-mail comments from customers are analyzed and shared with others.

In addition, ITA has not formally assigned responsibility for who should be receiving and analyzing e-mails from customers. ITA's customer e-mails are received by numerous individual web masters and trade specialists. However, many of these individuals have been assigned the responsibility on an ad hoc basis. With no established guidance to assign specific individuals the responsibility for addressing customer e-mails, ITA may not always be providing reliable responses to these comments. ITA needs to assign formal responsibility for addressing customer comments to ensure a consistent and high quality effort.

The final issue with regard to customer e-mail comments is that ITA needs to give more attention to "closing the feedback loop." Most of the feedback options, including the one on ITA's home page and export portal site, do not tell users if a response to their e-mail will be forthcoming. As a result, customers usually do not know if ITA will be responding or addressing their comment. One customer told us that she was disappointed when ITA did not respond to her e-mail suggestion to allow *Country Commercial Guides* to be printed in full, rather than a chapter at a time. This customer was expecting to receive an acknowledgment from ITA that it had received her e-mail and that it was working on a solution. Several federal web sites that post their policy for responding to customer e-mails are listed in Appendix A, as notable web sites for customer service. For example, the Environmental Protection Agency's web site states that it strives to respond to customer comments about the site, or refers the comment to the appropriate program, within 10 business days. ITA needs to determine whether customers should receive a response, and if so, when it can be expected. ITA should also post the policy on its web site.

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In its response, ITA states that it agrees with the recommendation. ITA clarified that the banner currently in place will be removed once the use of frames is eliminated from the site and that a consistent header, which is set to replace the banner, will continue to utilize the "contact us" option. ITA's response did not address how user e-mail comments, questions, and concerns are to be acknowledged and managed. In its action plan, ITA should address what policies and procedures will be established for collecting and managing e-mail feedback from users.

B.   *ITA's efforts to determine customer requirements and satisfaction need to be more comprehensive*

The best way to obtain user input is to ask for it. We found that ITA has not been utilizing different types of feedback mechanisms, such as focus groups and interactive on-line surveys, to get user problems, comments, and concerns. There are a number of methods and techniques to

obtain information from customers about web sites and on-line products and services that should be considered, including some that are successful in one part of ITA that could be tried by others. For example, MAC's BISNIS currently sends out e-mail requests to those on its subscription list asking customers if BISNIS has been helpful. In addition, US&FCS is planning to proactively contact customers to develop success story information. The process will be automatic, whereby an e-mail message, with a link to an on-line form, will be generated and sent to the contact points in companies that have participated in US&FCS activities. While these are good examples, more needs to be done by ITA to solicit user feedback.

Focus groups are one approach that can help ITA assess user needs and problems with its web presence. A focus group is an extended group interview or meeting, run by a moderator, that brings users together to discuss issues and concerns about web site features. This feedback technique is widely used in the private sector. The primary benefit of focus groups is to identify in detail what customers want from the Internet. In addition, an organization can learn a great deal by observing how the users in the group navigate the web site. As mentioned previously, SBA used focus groups to pre-test its Tradenet portal. One SBA official stated that the terminology on the Tradenet portal was revised based on feedback obtained from focus groups. Unlike SBA, ITA did not use focus groups to pre-test the "customer intentions" that were developed in-house before going on-line and, as a result, it is currently revising the intentions based on input received from TPCC members. ITA should consider using focus groups as a method of understanding customer needs prior to launching a new web site or making major changes to an existing site.

Users are more likely to respond to feedback requests if it occurs at the same time and place that they are using the Internet. Yet obtaining customer feedback about web site content, either by posting a question asking for comments or using an interactive questionnaire, is not a widespread activity across the ITA web sites. There are a few examples of ITA's efforts to collect feedback about a specific product. TD's Office of Textiles and Apparel solicits comments about a database via e-mail and MAC's BISNIS web site asks for on-line comments about a specific report. US&FCS includes a customer survey in the body of a market report, but it cannot be entered or returned on-line, requiring additional efforts by the customer to print, fill out, and mail or fax the response back to ITA. A web site that includes an e-mail address and a message such as, "Find a problem in this article? Send us an e-mail" would provide ITA with important feedback about specific content on its site.

The use of on-line interactive surveys is another method used to collect feedback quickly and efficiently. The only on-line interactive information collection we noted is the US&FCS "E Expo USA" customer survey that asks eight questions about satisfaction with the program, specifically a virtual trade show booth, and whether there have been any export successes. More could be done by ITA to solicit real-time feedback. In the private sector, many web sites provide a survey or questionnaire asking about the content in a variety of formats. Figure 4 is an example

Figure 4: Example of an On-line User Survey

How would you rate this ITA product?

Poor   ①   ②   ③   ④   ⑤   **Excellent**

Please send us an e-mail telling us what you did or did not like about the product. We welcome suggestions for future products. Webaddress@ita.doc.gov

of a potential on-line user survey. The survey encourages the reader to rate the product on-line based upon a five-point scale and provides the user with the opportunity to furnish written comments about the current or future product. Such information would be helpful to ITA to assess how others rate the materials provided. ITA should consider utilizing brief, immediate questionnaires regarding web site content, and ensure that any questionnaires comply with Paperwork Reduction Act requirements.

Finally, ITA has taken one positive step toward trying to understand customers' preferences by beginning to utilize web usage statistics. Web usage statistics define the characteristics and usage of customers who visit a web site. In the past year, US&FCS and TD started to collect and analyze web statistics for making decisions about the web site, including allocating more resources to updating web sites with many users and making improvements to web sites with few users. MAC is in the process of implementing the collection of web statistics as well. Web usage statistics are a valuable tool to help ITA managers make improvements to the web sites and for allocating resources to web projects more effectively. ITA should continue to implement and utilize web usage statistics, and coordinate the analysis to ensure that these statistics are consistently interpreted and utilized throughout ITA.

During this review, we heard a number of customer comments that indicate improvements to ITA web sites are needed. The following figure lists several examples of problems and suggestions to improve the ITA's web presence that customers brought to our attention.

Figure 5: Selected Customer Comments About ITA Web Sites

- List of industries excludes a few important ones such as environmental services, solid waste, and air pollution.

- The advanced search doesn't break down market research by industry and country.

- ITA's site should provide business information by sector, trade data on-line, and customized market reports.

- Looking up information in the InterAmericas web site is too difficult to find!!! After 10 minutes, still have not found it.

- You should allow for choosing more than one item from the list of products that a company sells.

- The most current lead I've been able to find is 6 months old, which makes it difficult to compete if others are getting this information first.

- Your site is full of bad links and bugs. I cannot navigate with your buttons as half of them don't seem to go anywhere.

- It would be extremely helpful to get Country Commercial Guides in full instead of by chapter.

- US&FCS did not respond to my e-mail and phone message about problems.

- Most government web sites, including ITA's, are constantly being reorganized. I just get accustomed to a site and it changes.

Many of these customer comments have the potential to save money and time for both the customer and ITA. To meet the needs of its customers, ITA should review and consider implementing the suggestions in Figure 5. In addition, ITA should do more to manage customer e-mails and utilize all varieties of feedback mechanisms. We believe this has not been done because it has not been a high priority to obtain and address feedback from web site users. In addition, ITA should establish guidance, requirements, and a formal process for requesting and using customer feedback about its web site.

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ITA concurs with this recommendation. However, ITA noted that one customer comment, that "ITA's site should provide business information by sector, trade data on-line, and customized market reports," was misleading because TD's individual industry offices provide business information by sector, TD's Office of Trade and Economic Analysis provides trade data, and the US&FCS site carries customized market reports. However, we believe that even though the information may be available on ITA's site, the user's difficulty in finding the information should be of equal concern. ITA provided a copy of a focus group plan that included an on-line survey. We ask that ITA provide us with a summary of the results of any focus groups sessions that have occurred by the time the action plan is submitted.

V.   Guidance Is Needed for Construction and Maintenance of ITA Web Sites

The maintenance of the pages on the ITA web sites varies from office to office.   A web page includes at least the following elements: copy, graphics, layout, and internal technical design. It may also have the ability to hook into existing databases and if the site has more than one page, or has links to other web sites, it needs to be designed for navigation. We found differences in the quality of pages. We believe this has occurred because there are no internal standards to guide the more than 300 web site owners who are responsible for creating and maintaining the pages on ITA's web sites. As a consequence, users will leave ITA's web sites and look elsewhere for the information they are seeking.

Unlike the earlier section that discussed web site content and the requirement for more cooperation between ITA program managers and web masters, this section is concerned with web site maintenance issues that are primarily the responsibility of web masters and web site owners.

Although not every page should look the same, the consensus in the industry is that the pages on a site should have some similar characteristics. With no common use of colors, fonts, or navigation tools, the ITA's web presence lacks a "corporate image." Even within the TD and MAC web sites the look of the different office sites varies significantly. The same is true for the few US&FCS overseas and domestic office web sites that were not eliminated when US&FCS streamlined its web presence. We understand the ITA portal task force is beginning to address these issues and is in the process of establishing standards for navigation, colors, and fonts so that the customer will encounter a similar look and feel across the ITA web sites. We fully support this effort and suggest that guidance regarding the use of graphics on the web sites also be incorporated into the standards.

In the early stages of ITA's web development efforts, the focus was on creating an Internet presence; and the need for future maintenance of the sites was often overlooked. However, when sites are poorly maintained, a number of problems can occur. We identified some problematic areas on ITA's web sites, including the collection of "cookies,"[25] outdated information, pages indefinitely "under construction," and non-working links. This is a partial list of the problems that need to be corrected as well as addressed by an internal set of guidelines.

Unapproved cookie collections should be stopped

We found a number of sites where cookies are being collected. According to a June 22, 2000,

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[25]A message that a web server causes to be placed on a user's hard drive that can be read by the server. The message is stored in a text file called "cookie.txt." While some cookies are used only in the browser session in which it is created, this discussion primarily refers to cookies that maintain information over multiple browser sessions. For more information about cookies, refer to the glossary in Appendix B, page 46.

OMB memorandum, federal web sites will not collect cookies unless there is a compelling need. If cookies are being collected, this must be publicly disclosed, and the agency head must approve the collection. We found at least five ITA sites where cookies are being collected that did not meet the above criteria. When we raised the issue, we found that most offices were unaware that cookies were being collected. Upon further investigation, it was discovered that the cookies are being collected by the company that provides an interactive communication tool being used by the various office sites. The Department's CIO office was unaware of this use of cookies and forwarded the problem to the Web Masters Group,[26] which is responsible for establishing departmental standards. On January 11, 2001, the CIO Council adopted a cookie policy developed by the Group. The policy prohibits the use of cookies on Department of Commerce web sites except where there is a compelling need, there are appropriate safeguards in place, the use is personally approved by the Secretary of Commerce, and there is clear and conspicuous notice to the public. The policy also outlines the process for gaining approval for the use of cookies. ITA should stop the use of cookies and ensure that, unless approved, cookies will not be collected on any ITA web sites. ITA should also issue guidance to ITA's web site owners about the new cookie policy along with any ITA procedures for gaining approval.

Outdated information on ITA web sites should be removed, updated, or archived

Maintaining current information is a challenge faced by most web sites. When old information is not removed, updated, or archived, it can mislead a web site user or give the user a poor impression about the usefulness of the site. At the time of our review, we found some examples of outdated information on ITA's sites. For example, the market development cooperator program in TD had fiscal year 2000 application information for the program on the site, two months after the end of the fiscal year, and no mention of the program's intentions for fiscal year 2001. Even with the uncertainty of fiscal year 2001 appropriations, some information regarding the status of the program should be provided on the site. Another example is the Mercosur[27] home page in MAC, which had not been updated in over a year, although the web site owner, who is on a detail to another office, intends to update it as soon as he is available to do so. Guidelines for updating and archiving information should be established by ITA.

We also found instances where we could not tell if information was current or not. Web site

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[26]The Web Masters Group consists of members from across all of Commerce and serves as an advisory body to the Department of Commerce CIO and the Department's CIO Council. The group provides input on a number of matters, including Departmental Internet policy issues and standards. For more information about the Group, refer to the glossary in Appendix B, page 46.

[27]A site with information about the Treaty of Asuncion, which provides the legal basis for the Southern Common Market (Mercosur), which will eventually allow for the free movement of goods, capital, labor, and services between Argentina, Brazil, Paraguay, and Uruguay.

information with no reference to a date (e.g., last updated 02/14/01) can be confusing and leave a poor impression. For example, the TD Service Industries and Finance section lists markets of opportunity for the services industry. While this may be a very useful product, it does not indicate when the information was posted and/or last updated. Guidelines for providing the date that information is posted or last updated, whichever is appropriate, should be developed.

No page should indefinitely be "under construction"

As with many web sites, we found pages indefinitely "under construction." Some experts state that if a web site is not finished, it should not be shown. While this may not be realistic for existing sites undergoing a change, ITA should establish some rules about new pages, such as how long a site can be under construction, or whether a site under construction should be on-line before it is completed.

Links should be operational and external links should be apparent when accessed

Dead links inevitably occur on web servers as pages are modified, moved, or deleted over time. ITA should ensure that all links are valid and operational. A related issue are links to other organizations that are not clearly identified as external links and, when accessed, do not inform users that they are not on an ITA web site. For example, from MAC's Free Trade Area of the Americas (FTAA) home page, if users click on "Progress in the FTAA" and then click on any of the six hypertext options, they are taken to an external site.[28] However, users have no way of knowing that they are no longer on an official ITA site. Moreover, some external sites collect cookies, like FTAA, giving the false appearance that ITA is collecting the information.

Standards and guidelines are needed

The web site is part of an organizations's public face. Lack of ongoing maintenance can reduce the impact and value of even the best-designed and most interesting site. This can reflect poorly on the organization and may cause users to abandon the site and not return.

As mentioned previously, ITA allowed units to develop and manage their sites on an office-by-office basis with little or no guidance from ITA and the Department. US&FCS is the only unit that developed some minimal standards for its web site. Many other organizations, such as the Australian government and SBA, have developed guidelines and standards for web site owners to abide by. The Australian government guidelines are very thorough and cover all forms of

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[28]A site maintained by the Inter-American Development Bank, the Organization of American States, and the United Nations Economic Commission for Latin America and the Caribbean on behalf of the member governments of the countries participating in the Free Trade Area of the Americas.

electronic publishing—CD-Rom, diskette, and the Internet. The Internet guidelines cover structuring and creating the site, navigating the site, structuring information, page design, and metadata (how the information will be described). The SBA standards are not as complete but offer good guidelines for the web site owner. Because there are so many people involved with ITA's web sites, internal standards and guidelines for constructing and maintaining web sites are particularly important.

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As acknowledged in the draft report, the ITA portal task force had already begun the process of establishing official ITA web standards. In its response to our draft report, ITA states that the standards include policies and guidelines in a number of areas. Since it is not clear that the areas covered in this section of the report will be included in the proposed standards, we request that ITA provide us with a copy of the standards with its action plan.

VI.   ITA Must Ensure Compliance with Established Standards and Laws

ITA is continuing its efforts to bring its web sites into compliance with five departmental standards and two federal statutes—the Paperwork Reduction Act of 1995, for which the Department has issued guidelines, and the proposed Section 508 of the Rehabilitation Act, for which OMB has recently issued final regulations.

A.   *ITA needs to ensure compliance with departmental standards*

As of November 2000, the Department had established five web site standards.[29] Most of ITA is in compliance with the standards, but we did find some sites that were missing some of the information that is now required. Since there are few incentives for the staff in charge of the web sites to implement the standards, ITA should find the means to ensure prompt compliance.

The Department's web standards have been developed by the Web Masters Group, submitted to the Chief Information Officer Council, and approved by the Commerce Chief Information Officer. How the standards are to be implemented is left up to each operating unit. For example, the first standard states that every agency home page shall link to the Commerce home page, but does not specify what the link should look like or where it should appear on the page. The five standards are listed below.

Commerce Web Standards as they apply to ITA

1. **ITA home page shall link to the Commerce home page.**
2. **Every home page within an ITA organization shall link to ITA's home page.**
3. **All web pages shall identify the organization managing the web site.**
4. **Every web site shall provide an e-mail address for comments and inquiries.**
5. **All major points of entry and any page where information is collected shall include a clearly identifiable link to the Privacy Statement.**

In addition to these five standards, the Web Masters Group is working on a standard requiring all Commerce web sites to have ".gov" domain name and another requiring agency CIOs to certify that all web sites within their organization comply with the Department's web standards and policies.

ITA is in compliance with the first standard; the ITA home page links to the Commerce home page. While most of the unit sites are in compliance with the remaining four standards, we found

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[29]The standards can be found on the Web Master's Group web site at http://www.doc.gov/webresources/.

some exceptions.

The second standard requires that all office home pages include navigational links to the home page of a higher level organization within its hierarchy. For example, all industry sites should link to the TD home page, and the TD home page should, in turn, link to the ITA home page. We found instances where links do not exist. For example, MAC's China gateway, the US&FCS information and communications technology team's site, and TD's industry consultations program do not have links to higher levels of the organization. The purpose of this standard is to establish a series of navigational links that will eventually lead the user to the ITA home page which, in turn, will take the user to the Commerce home page, per the first standard. If users follow links directly to subsection pages buried deep within the hierarchy of web sites, they may never see the home page or other introductory information in the site. "Dead-end" pages with no links to any other local page in the site can be frustrating for users and are a lost opportunity to bring users to other pages in the site. All pages should contain links going up the hierarchy, so as to enable users to access other portions of the web site.

The third standard requires that web pages identify the "web site owner." The standard does not specify how or where the identifier should appear on the page, leaving these decisions to the operating unit, and only applies to pages that have been modified since the August 11, 2000, implementation deadline. TD's new "safe harbor" program home page is an example of a web site that is not in compliance. The standard allows users to know which organization within ITA is responsible for providing the information or service they are viewing.

The fourth standard requires every Commerce organization to provide an e-mail address for comments and inquiries. Most pages have a contact point listed; however, as we discussed earlier (see page 24), ITA could, by providing more detailed guidance to web site owners, do more to solicit and use feedback from customers.

The fifth standard requires that every major point of entry, and any page where information is collected on any Commerce site, include a clearly identifiable link to the privacy statement. Privacy statements inform users how information collected over the Internet will be used and protected. We found that MAC's home page and the Trade Compliance Center in MAC, both major points of entry, do not have the privacy statement listed. In addition, two pages where information is collected can be found on TD's Tourism industries site and another on the US&FCS Women in International Trade site, none of which link to a privacy statement. Ignoring this standard may discourage users from participating in interactive on-line activity or even viewing the site because they will not know how ITA is using and protecting information or whether the site may be tracking user preferences through the use of cookies.

Each standard was put in place for a particular purpose. Possible consequences of a standard not being fully implemented include dead-end pages and user frustration. We believe some web

publishers are not implementing the standards because they are either unaware of the standards or do not consider implementing them to be a high priority. Moreover, there are currently no incentives to comply with the standards. ITA should ensure prompt compliance with departmental standards by providing guidance on the standards and their usage and holding web masters and web site owners accountable for compliance.

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In its response, ITA stated that as recognized in the report, progress has been made in ensuring compliance with Departmental web standards and that ITA will continue to work toward full compliance. In addition, in response to the prior recommendation to develop internal standards and guidelines, ITA said that its proposed web standards will contain reference to all of the Department's web standards.

ITA did not directly indicate how web masters and web site owners will be held accountable for compliance. If the ITA web standards address this issue in response to the recent Departmental Certification Policy (Enforcement of Web Site Standards and Policies), then no further action is needed as we have previously requested a copy of ITA's web standards as part of its action plan. If, however, ITA's web standards do not address how compliance will be ensured, please provide us with an explanation in the action plan.

B.   ITA needs to provide guidance and oversight to staff on federal legal requirements

Two federal statutes—the Paperwork Reduction Act of 1995, which covers regulations for the collection of information from the public, and Section 508 of the Rehabilitation Act, which covers equal accessibility to information technology—present complex issues affecting ITA's web presence. Both statutes require continued oversight and guidance from ITA to enable the agency to achieve full compliance.

Paperwork Reduction Act of 1995

Since 1942, the Paperwork Reduction Act and its predecessors have provided policy and established requirements for the government collection of information. The Paperwork Reduction Act of 1995 requires federal agencies to seek OMB approval when collecting "standardized" information from 10 or more persons outside the federal government. The act covers all types of data collection techniques—paper, telephone, in-person, and electronic means. Approval is required whether the information collection is voluntary or mandatory. Once approved, the office collecting the information must inform respondents why the information is being collected, how it will be used, approximately how long it will take to provide the information, and whether the information is mandatory or voluntary, and provide a valid OMB control number.

Contact information, such as name, address, business/company name, telephone and facsimile numbers, and e-mail addresses are not covered by the act. In addition, general, open-ended questions and undifferentiated "suggestion boxes" requesting ideas, comments, and suggestions are also exempt from the act because the questions are not "standardized." For example, MAC's Trade Compliance Center has an on-line hotline form that collects contact information and asks the respondent to "Tell us in your own words the problem you are encountering or the question you have. Take as much space as you need."

We found information collection activities on ITA web sites that did not meet the requirements of the act. Some approved collections were missing the burden statement and other required information, while other collections have apparently never been approved. Among the information collection activities we found that have been approved by OMB but are missing the required control number and/or the burden statement information include TD's export finance matchmaker questionnaire, TD's safe harbor program survey, and US&FCS's Orange County export assistance center's preliminary consultation survey.[30] Surveys and other requests for information that have apparently never been approved by OMB include TD's Environmental Technologies industry office non-tariff barriers survey, TD's Tourism industry office subscription sign-up form, and TD's Service Industry and Finance office electronic mailing list subscription information.

The Paperwork Reduction Act was implemented to minimize the public's burden in responding to government requests for information. The act is also in place to ensure that similar collections of information are not occurring elsewhere in the government. Guidance regarding complying with the act on departmental web sites was issued by the Department as recently as April 1999. However, either the guidance did not reach all levels of staff or, due to personnel changes and turnover, the current staff is unaware of the act's restrictions. In addition, the ITA office responsible for the oversight of the act was unaware of all of the information collection activities occurring on the web site.

ITA needs to prepare the necessary guidance to ensure that all staff are regularly informed about the restrictions for collecting information from the public. ITA should also conduct periodic reviews of web sites to ensure compliance with the Paperwork Reduction Act.

Accessibility Standards

Section 508 of the Rehabilitation Act requires that when a federal department or agency develops, procures, maintains, or uses electronic and information technology, it shall ensure that the technology is accessible to people with disabilities, unless it can demonstrate that an "undue

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[30]OMB control numbers, respectively, are 0625-0232, 0625-0239, 0525-0237.

burden" would be imposed on the department or agency. In general, electronic and information technology becomes accessible to persons with disabilities when it can be used or accessed through more than one human sense or ability. The standards apply to federal web sites but not to private web sites, unless those sites were developed, procured by, or provided under contract to a federal agency.

The Access Board, an independent federal agency devoted to accessibility for people with disabilities, developed and published the final standards for ensuring access to electronic and information technology on December 21, 2000, in the *Federal Register*. The standards will become effective on June 21, 2001.

ITA has made a start toward ensuring compliance with Section 508. In August 2000, the ITA web master asked web managers and publishers to run their home pages through an automated diagnostic software tool, called "Bobby,"[31] to identify significant barriers to people with disabilities.

We conducted "Bobby"-assisted reviews of the home pages and found that home pages that were in compliance at one time, were now out of compliance. The new ITA home page and export portal have never been in compliance with Section 508, which is one of the primary reasons given for eliminating the existing banner and reworking the portal. The results of our US&FCS, TD, and MAC home page reviews are shown in Table 4.

Table 4: ITA unit home pages that pass the "Bobby" accessibility test

Test results as of:	MAC	TD	US&FCS
November 30, 2000	Accessible	Not Accessible	Accessible
January 3, 2001	Accessible	Not Accessible	Not Accessible

MAC passed the accessibility review in both November and January. TD's home page, however, did not pass on either date even though TD displays the "Bobby" seal of approval on its home page. The TD web master explained that the home page was compliant with an earlier version of the diagnostic tool. The "Bobby" test printout indicated that TD's home page requires alternative text for a number of images, a relatively easy fix. The US&FCS home page passed in November but did not pass in January. The ITA web master suggested that moving the US&FCS web site from one server to another and tightening security might account for the loss of the positive accessibility rating.

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[31]The Bobby diagnostic tool was developed by the Center for Applied Special Technology, a not-for-profit organization whose mission is to expand opportunities for people with disabilities through innovative uses of computer technology. Information about Bobby and the Center can be found at http://www.cast.org/bobby.
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As shown, ITA has made a start toward ensuring compliance with Section 508. As we noted, however, changes made to a page or with a server can easily impact the accessibility rating. ITA must take appropriate actions now to ensure that web sites will be in compliance with Section 508 of the Rehabilitation Act once it becomes effective on June 21, 2001.

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With regard to the Paperwork Reduction Act, ITA's response stated that it has prepared and made guidance about the act available on-line, issued announcements, and established controls for information collection activities. ITA also stated that it will conduct annual reviews of the web site in addition to periodic checks. Finally, ITA resolved all of the information collection activities that were identified in the draft report as problematic.

ITA stated that it has already devoted considerable attention to compliance with Section 508 of the Rehabilitation Act. Its policies and guidance on Section 508 will be included in the ITA web standards.

RECOMMENDATIONS

We recommend that the Under Secretary for International Trade:

1.   Create an ITA Web Governance Board made up of senior-level program managers and web experts to ensure that the content on ITA's web sites is organized around customer requirements and does not duplicate existing information. The Board's efforts may include, but should not be limited to (a) consolidating like information into one database, (b) creating an application group, preferably by expanding the existing US&FCS e-commerce task force, (c) increasing the use of links, (d) developing and using a common dictionary of terms to better manage web site content, and (e) deciding what and where information should be provided on the ITA web sites and assigning office responsibility (see page 10).

2.   Prepare a formal proposal to the Secretary of Commerce to present to the Trade Promotion Coordinating Committee that calls for the creation of a standing committee on information technology. The standing committee should be composed of senior-level program and technical experts, to coordinate, develop, and maintain interagency on-line export information and services. The standing committee should have non-voting representation on the ITA Web Governance Board (see page 15).

3.   Conduct a comprehensive review of ITA's current and planned products and services to identify and reengineer those that could be placed on-line, with an emphasis on expanding customer transactions, as appropriate. This review should result in a plan that will (a) identify off-line products that have the potential to be on-line, (b) explain why an off-line product or service is not going to be on-line, (c) identify new opportunities for on-line transactions, (d) identify ways that existing on-line products and services will be improved, and (e) be updated annually or as needed (see page 19).

4.   Make appropriate use of feedback mechanisms to improve web sites, such as establishing policies and procedures for collecting and managing e-mail feedback from users and utilizing focus groups, real-time surveys, and web statistics (see page 24).

5.   Develop internal standards and guidelines for maintaining high-quality web sites. The guidelines should include specific instructions to web masters and web site owners about cookies, archiving information, identifying when information was posted or last updated, and maintaining external links to ensure that they are valid, operational, and clearly identified as external links (see page 30).

6.   Ensure prompt compliance with departmental web site standards (see page 34).

7.   Prepare the necessary guidance to ensure that all staff are regularly informed about the Paperwork Reduction Act and its restrictions on collecting information and conduct periodic reviews of web sites to ensure compliance with the act (see page 36).

8.   Take appropriate action to ensure on-going compliance with Section 508 of the Rehabilitation Act once it becomes effective on June 21, 2001 (see page 37).

APPENDIX A

Recommended Web Sites and Best Practices

Organization	Description
ON-LINE PRODUCTS	
Australian Trade Commission	Australian government's "Partnership Self Assessment" allows exporters to assess the strengths, weaknesses, and potential for success of their existing business partnerships in South East Asia. http://www.austrade.gov.au/exportassistance/partnerships/
Canadian Business Service Centers	Canadian public-private cooperative effort that allows customer to write a business plan on-line using the "Interactive Business Planner." http://www.cbsc.org/ibp/
TSCentral	A private sector trade event company sponsors on-line discussions between exhibitors on its Trade Show Central web site. http://ww0.tscentral.com/CommunityCenter/index.jhtml
CUSTOMIZED INFORMATION	
Small Business Administration	Tradenet.gov portal allows for a personal, customized page similar to a yahoo home page. http://www.tradenet.gov/MyExport/bin/myexport.pl
Industry Canada's "Strategis"	Canadian government site where users can create customized market reports based upon selected topics and countries from the *CIA World Factbook*, international business practices, market research reports, and US&FCS *Country Commercial Guides*. http://strategis.ic.gc.ca/SSG/bi18351e.html
Canadian Trade Commissioner Service's Team Canada, Inc.	Canadian government site that will soon offer a tool that will organize and classify information into categories and sub-categories, similar to a Yahoo page. The site also intends to include a notification tool that will automatically inform users of changes to the content in those areas of interest identified by them. http://exportsource.gc.ca/dindex2_e.html
California Trade and Commerce Agency	State of California customized web site collects information about the customer, then highlights information that is relevant to the customer's specific business needs. http://www.commerce.ca.gov/custom/
Australian Trade Commission	Australian government site lets a registered user create a customized "My Online" site with personal preferences. http://www.austrade.gov.au/toolbar/subscribers.asp
SUBSCRIPTION SERVICES	
Foreign Agricultural Service	U.S. Department of Agriculture site where the user can subscribe to on-line press releases and attache reports. http://www.fas.usda.gov/scriptsw/attacherep/default.asp
Department of Energy	U.S. Department of Energy site that has a free, "Fossil Energy News Alert" e-mail service. Customers receive an e-mail each time the web site is updated for specified areas of interest. http://www.fe.doe.gov/newsalert/newsalert_signup1.html
Department of Energy	U.S. Department of Energy E-Mail (Listserv) notification, where a customers can receive e-mails on over 40 energy subject areas. http://tonto.eia.doe.gov/email/index.htm
Australian Trade Commission (Austrade)	Australian government site where exporters can access export intelligence, including customized export news, information, targeted e-mail updates, discussion group forums, and market profiles. http://www.austrade.gov.au/toolbar/subscribers.asp

Organization	Description
Singapore Trade Development Board	Singapore trade promotion agency site that allows a Singapore-based company to subscribe to up to six types of market alerts for five countries. http://www.tdb.gov.sg/emailalerts.shtml
ON-LINE USER SURVEYS	
Microsoft Network	A private sector site with an on-line survey that encourages the reader to rate the article based upon a five-point scale and allows the user to provide written comments. The number of users and current rating of the article are displayed, as well as the option to read other user comments. http://www.msn.com
MSNBC	A private sector site with an on-line survey that asks users to rate whether they would recommend the story to other viewers on a seven-point scale. After the user rates the news story, a screen appears thanking the user for voting and then provides the option for the user to see the current "Top 10" rated list of news stories. http://www.msnbc.com
Newsmedia	A private sector site with an on-line survey asking users to please rate the article on a five-point scale. http://www.newmedia.com/
EASY-TO-USE	
Texas Department of Economic Development (DED)	State of Texas economic development clearinghouse allows users to provide on-line suggestions for additional economic development resources to be added to the database. http://www.edinfo.state.tx.us/about.htm
Texas DED	State of Texas site that allows users to download and print DED application forms. http://www.tded.state.tx.us/download/
Arlington County, Virginia	Commonwealth of Virginia site has a listing of all state on-line forms that can be downloaded for printing, with some that can be submitted on-line. http://www.co.arlington.va.us/web/forms_on.htm
The White House	U.S. government site that redirects the user to another page on the site when a user is sent to an old link where the "Page Does Not Exist." http://www.whitehouse.gov/cgi-bin/Correspondence/Mail_Developer
Department of Education	U.S. Department of Education site provides various departmental program guides in both text and pdf files to minimize user compatibility issues. http://www.ed.gov/pubs/guides.html
Department of Energy	U.S. Department of Energy site lists on-line publications that can be sorted alphabetically or chronologically and printed. http://www.em.doe.gov/doclista.html
The White House	U.S. government site with a powerful search engine that links to all online U.S. Federal Government resources. http://www.firstgov.gov
ON-LINE EXHIBITIONS & TOURS	
Trade Partners UK	British government site that allows customers to take a guided tour of the site, with moving pointers to highlight the key features on the site. http://www.tradepartners.gov.uk/
NASA	National Aeronautics and Space Administration site has a virtual tour of a space station. http://spaceflight.nasa.gov/gallery/vtour/index.html

Organization	Description
MULTIPLE LANGUAGES	
Trade Partners UK	British government site that is available in six languages for international buyers covering the UK international network of offices, finding UK partners, and investors. http://www.tradepartners.gov.uk/international.html#top
ON-LINE TRADE LEADS	
Texas DED	State of Texas site with a market place that allows companies to post buy and sell ads. Users can browse by industry group or search by key word. http://www.marketplace.state.tx.us/
Foreign Agricultural Service	U.S. Department of Agriculture site offers trade leads by country, commodity and date. http://www.fas.usda.gov/scripts/agexport/tradeleadquery.asp
Exporthotline.com	Private sector site where users can search the ExporTel database of potential partners, buyers, customers, and suppliers, by keyword and view the resulting matches. http://exporthotline.com/content/layout/asp/ehc_layout.asp
ENCOURAGES OTHERS TO LINK TO YOUR SITE	
Australian Trade Commission (Austrade)	Australian government site that provides guidance to external entities regarding linking to the Austrade site. Guidance includes the URL to use, brief description of Austrade on-line, use of the Austrade logo, and conditions of linking to Austrade on-line and republishing material from its site. http://www.austrade.gov.au/GENERALINFO/Page47804.asp
Agency for Healthcare Research and Quality	U.S. Department of Health and Human Services provides information to external sources about linking to the site. http://www.ahrq.gov/news/weblink.htm
FEEDBACK	
Environmental Protection Agency	U.S. Environmental Protection Agency site directs the user to four different places to send a question, a comment, a request for technical assistance, or a question from outside the U.S. http://www.epa.gov/epahome/comments.htm
Forest Service	U.S. Department of Agriculture site where users can direct comments to Forest Service programs, opportunities, or management areas. http://www.fs.fed.us/links/feedback.shtml
Federal Trade Commission	U.S. government site that directs users to send comments or complaints to the office that handles antitrust or competition matters, consumer protection issues, and technical web site problems. http://www.ftc.gov/ftc/talk_to_us.htm
New Zealand Trade Development Board	New Zealand government site that directs users to different pages based on different inquiries, such as organizing a visit, contacting an overseas office, asking an import question, asking student questions, and commenting on the web site. http://www.tradenz.govt.nz/contact/index.html
CUSTOMER SERVICE	
National Institutes of Health	U.S. Department of Health and Human Services site explains the hours that e-mail messages are answered by specialists and how they try to respond within 48 hours. Routes users to other areas of the site for medical and funding questions. http://www.nih.gov/about/abomail.htm
National Weather Service	U.S. Department of Commerce site offers three options for sending in comments about the web site—via an on-line form, by mail, and via e-mail to web master—and mentions that a reply may take two or more work weeks. http://www.nws.noaa.gov/feedback.shtml

Organization	Description
Environmental Protection Agency	U.S. Environmental Protection Agency site states that EPA strives to respond to customer comments about the web site, or refers the comment to appropriate program, within 10 business days. http://www.epa.gov/epahome/comment2.htm
The White House	U.S. government site states that all messages pertaining to the technical operation and usability of the White House web site are read and that e-mails are not answered or forwarded. http://www.whitehouse.gov/WH/Mail/html/Mail_Developers.html
California Chamber of Commerce	Chamber of Commerce site with an interactive "Answer Center." Customers can browse frequently asked questions by topic, or e-mail a question on-line, or search a solution database of previous questions using key words. http://www.calchamberstore.com/calchamber/

APPENDIX B

Glossary of Terms and Acronyms

Address: The location of an Internet resource. An e-mail address may take the form of msmith@somecompany.com. A web address looks something like "http://www.doc.gov."

Anchor: Either the starting point or destination of a hyperlink. Clicking an anchor takes you to another part of a page or to a page on another site on the web.

Banner: Narrow graphics (i.e., logos or signboards) used to mark a place where the reader can click to get more information, or as letterhead at the top of each page to display the organization's logo.

BISNIS - Business Information Service for the Newly Independent States: A MAC program that serves as a resource center for U.S. companies exploring business opportunities in the newly independent states of the former Soviet Union. Provides U.S. companies with market reports and tips on developments, export, and investment opportunities, and strategies for doing business in the region. The URL for this site is: http://www.bisnis.doc.gov

Browser: A software application, like Netscape Navigator or Microsoft Internet Explorer, that knows how to go to a web server on the Internet and request and pull a page through the network and into your machine. Browsers also know how to interpret the set of HTML tags within the page in order to display the page on your screen as the page's creator intended it to be viewed.

CEEBIC - Central and Eastern Europe Business Information Center: A MAC program that offers a variety of services to U.S. businesses to facilitate trade and investment between the U.S. and Central and Eastern Europe. The URL for this site is: http://www.mac.doc.gov/eebic/ceebic.html

Cookie: A message given to a web browser by a web server. The browser stores the message in a text file on the user's computer called "cookie.txt." The message can then be used to track the activities of users over time and across different web sites, thus making it possible to build a profile of a user's preferences, tastes, web reading habits, and other characteristics by combining information gathered from multiple visits to different web sites.

Country Commercial Guides: An annual document prepared by US&FCS overseas staff that contains information about the business and economic situation of foreign countries as well as the political climate as it affects U.S. business. It also lists best prospects for export opportunities for U.S. companies.

Domain: The Internet is divided into smaller sets known as domains, including .com (business), .gov (government), .edu (educational) and others.

Domain Name: Allows you to reference Internet sites without knowing the true numerical address.

E-Expo USA: A US&FCS program that offers U.S. companies a low cost platform to market their products and services internationally via the Internet. The site offers companies a virtual show booth that is on-line 24 hours a day, seven days a week, 365 days a year.

Electronic Signature: A method of signing an electronic message that identifies and authenticates a particular person as the source of the message and indicates their approval of its contents. A digital signature may be digital and encoded, using cryptographic techniques.

E-mail: Electronic mail is an application that allows messages to be transmitted via data communications to electronic mailboxes.

EPA - U.S. Environmental Protection Agency.

Home Page: The first page of a web site. This is also the web site that automatically loads each time you launch your browser.

HTML - HyperText Markup Language: The coding system used to create world wide web pages.

HTTP - HyperText Transfer Protocol: The main protocol used on the world wide web that enables linking to other web sites.

Hyperlink: A connection between two anchors. Clicking on one anchor will take you to the linked anchor. The anchors can be within the same document/page or two totally different documents.

Hypertext: A document that contains links to other documents, commonly seen in web pages and help files. In most browsers, hypertext is shown underlined.

Internet: The loosely connected worldwide collection of computer systems that uses a common set of communications standards to send and receive electronic information.

Link: An active connection to another web page, location in a web page, file, or other Internet resource. Selecting the link takes you to the new location or resource.

MAC - Market Access and Compliance: An ITA unit responsible for helping U.S. businesses overcome barriers to trade and investment. MAC provides information to enable businesses to benefit fully from market access openings from the over 200 trade agreements. The URL for its site is: http://www.ita.doc.gov/MAC.

Metadata: Information about data or, more specifically, the descriptive information provided in a tag used in the header of a page to provide information about the page.

Multimedia: A combination of media types on a single document, including text, graphics, animation, audio and video.

NAFTA - North American Free Trade Agreement.

OIG - Office of Inspector General.

OMB - Office of Management and Budget.

Page: An HTML document, or web site.

Platform: The type of computer or operating system on which a software application runs. Some common platforms are PC, Macintosh, Unix, and Next.

Portal: An entry point or starting site for the World-Wide Web, combining a mixture of content and services and attempting to provide a "home base" for its audience with an organization that is intended to guide users easily through the web.

Search Engine: A tool for searching information on the Internet by topic. Popular engines include InfoSeek, Inktomi, and Web Crawler.

Server: One half of the client-server protocol, runs on a networked computer and responds to requests submitted by the client. A world wide web browser is a client of a world wide web server.

Site: A single or collection of related web pages.

TIC - Trade Information Center: A resource for information on federal government export assistance programs that is operated by ITA for the Trade Promotion Coordinating Committee. The URL for this site is: http://www.ita.doc.gov/td/TIC

TOP - Trade Opportunity Program: A program in US&FCS which provides trade leads that

can be retrieved on-line by U.S. exporters by industry, country, and lead type.

TD - Trade Development: An ITA unit responsible for promoting U.S. exports by providing industry expertise, from basic manufacturing to high technology and service exports. TD participates in trade negotiations, manages trade missions to overseas markets, and advocates for U.S. bidders for international contracts. The URL for its site is: http://www.ita.doc.gov/TD

TPCC - Trade Promotion Coordinating Committee: Composed of the 19 federal agencies who are responsible for managing the U.S. Government's export promotion programs and activities. The list of member agencies can be found in Appendix C.

URL - Uniform Resource Locator: Short strings, commonly known as web site addresses, that point to resources on Internet (*e.g.*, http://www.doc.gov points to the Commerce home page).

US&FCS - United States and Foreign Commercial Service: An ITA unit responsible for providing trade assistance, including trade counseling, trade contact services, product and service promotion, market research, and trade leads to U.S. firms. US&FCS has both domestic and overseas offices. The URL for its site is: http://www.usatrade.gov/.

USEAC - United States Export Assistance Center: A domestic office of US&FCS.

Web master: Someone who keeps a web site running and available to its readers.

Web Masters Group: A departmental group that consists of members from each Commerce agency plus the Commerce Department Web Master (from the Secretary's Office of Public Affairs) and a representative of the CIO. The Group serves as an advisory body to the Commerce CIO and Commerce CIO Council and provides input on matters such as the Department's Internet and Intranet presence, web site and web server security issues, departmental Internet policy issues and standards, and other matters as directed by the Commerce CIO or CIO Council. The URL for the Group and for departmental standards can be found at http://www.doc.gov/webresources/.

Web site and web page: A web site is a collection of one or more web pages. A web page is a single file that can be displayed on the web. Web pages can be a few lines of text, or several book pages long.

World wide web or web: The subset of the Internet capable of providing the public with user-friendly graphics-based multi-media access to information on the Internet. It is the most popular means for sorting and linking Internet-based information in all multi-media formats. Navigation is accomplished through a set of linked documents that may reside on the same computer or on computers located almost anywhere else in the world.

APPENDIX C

**Trade Promotion Coordinating Committee
Member Agencies**

Agency for International Development
Council of Economic Advisors
Department of Agriculture
Department of Commerce
Department of Defense
Department of Energy
Department of the Interior
Department of Labor
Department of State[32]
Department of Transportation
Department of the Treasury
Environmental Protection Agency
Export-Import Bank of the United States
National Economic Council
Office of Management and Budget
Overseas Private Investment Corporation
Small Business Administration
United States Trade and Development Agency
United States Trade Representative

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[32]There were 20 TPCC agencies until 1999, when the Department of State absorbed the United States Information Agency.

APPENDIX D

Agency Response

UNITED STATES DEPARTMENT OF COMMERCE
The Under Secretary for International Trade
Washington, D.C. 20230

MAR 2 8 2001

MEMORANDUM FOR   Johnnie E. Frazier
                 Inspector General

FROM: Timothy J. Hauser, Acting

SUBJECT: Although Progress Has Been Made, More Needs to be Done to
                 Deliver On-Line Export Information and Services
                 Draft Inspection Report No. IPE - 13213/March 2001

Thank you for the opportunity to review the draft inspection report on ITA's efforts to develop and deliver On-Line Export Information and Services. ITA has spent considerable time and effort over the past several years developing and refining its web presence and on-line service delivery capabilities. Although the report contains valid findings and recommendations, we are concerned that the timing of the study resulted in a somewhat negative tone because ITA is currently in the midst of restructuring its web presence. As we discussed, your inspection took place when we were in the process of addressing many of the concerns you cited. While you complimented us on the speed with which we responded to some recommendations, the reality is that these were processes and redesigns already in progress. We believe that this report would have been more beneficial if performed at a different period in our redesign process.

We know the team encountered challenges evaluating ITA's on-line export information and services since we are engaged in many business process redesigns. We hope the OIG will be able to address these factors since they impact the validity of certain conclusions drawn by the review team. We hope that review of our comments will result in the inclusion of our suggestions in your final report. We also wish that the report was more positive in recognizing our efforts and achievements.

ITA believes that on-line delivery of products and services is an important tool to improve customer service and governmental efficiency through the use of information technology. We also believe that the Government Paperwork Elimination Act (GPEA) is an important tool in fulfilling the vision of improved customer service and governmental efficiency.

We have prepared ITA actions and general comments on the report. We intend to complete these actions in a time frame which ensures expedience but balances the use of our staff and resources with other program priorities. If you or your staff have questions, please contact Ed Meyer at x5436.

cc: L. Cheatham

Attachment

ITA Actions on Draft Inspector General (IG) Report Recommendations

The draft report is a thoughtful and encouraging study of how ITA's export programs have joined together to make the Internet a richer channel for serving U.S. small and medium size enterprises. Below are ITA's comments and a statement indicating planned actions to be taken on each IG recommendation. ITA also indicates where action has been completed.

The IG recommended that the Under Secretary for International Trade:

1.   **Create an ITA Web Governance Board made up of senior-level program managers and web experts to ensure that the content on ITA's web sites is organized around customer requirements and does not duplicate existing information. The Board's efforts may include, but should not be limited to (a) consolidating like information into one database, (b) creating an application group, preferably by expanding the existing US&FCS e-commerce task force, (c) increasing the use of links, (d) developing and using a common dictionary of terms to better manage web site content, and (e) deciding what and where information should be provided on the ITA web sites and assigning office responsibility.**

ITA action:

In August of 2000, ITA proposed the creation of an ITA Web Governance Council (WGC) as part of the planned Phase II of its web project and in recognition of the need for senior-level oversight of ITA's web presence and content. It is envisioned that WGC membership will consist of the ITA CIO, the ITA CFO, and senior-level designees of each of ITA's four program units to be appointed by the Undersecretary for International Trade. The WGC will report directly to the Deputy Undersecretary who will back council decisions and resolve issues for which the council can not achieve consensus. According to the plan, the WGC will be chaired by the ITA CIO, a new position within the ITA organization, and will focus on high-level governance issues to ensure a coordinated approach toward developing a cohesive online presence for ITA and to execute ITA/DOC strategy. In addition, the WGC will empower applicable working groups to address issues relating to duplication of content (in process), setting ITA web development standards (in process), and resolving difficult ITA issues.

The creation and structure of WGC was conceived prior to the preparation of this IG report and addresses all elements of this IG recommendation. ITA awaits only the pending confirmation of the new Undersecretary for International Trade and the arrival of the new ITA CIO to fully implement the WGC and, in effect, fully address this IG recommendation.

2.   **Prepare a formal proposal to the Secretary of Commerce to present to the Trade Promotion Coordinating Committee that calls for the creation of a standing committee on information technology. The standing committee should be composed of senior-level program and technical experts, to coordinate, develop, and maintain**

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interagency on-line export information and services. The standing committee
should have non-voting representation on the ITA Web Governance Board

ITA action:

In November 2000, ITA developed a plan to create a TPCC Export Portal Working Group that
would be responsible for the coordination and development of interagency on-line export
information and services. Its responsibility will include not only the coordination of interagency
involvement in the export.gov site but also more general information technology initiatives. This
group would have one member who would attend ITA's Web Governance Council (WGC) to
ensure continued coordination with ITA plans.

Currently there exists an informal interagency working group that is focused on integrating the
TPCC agency programs into the Export.Gov web site. Once that task is completed, the working
group will be formalized into the Export Portal Working Group and meet once a month to
discuss long range plans and initiatives.

3.   **Conduct a comprehensive review of ITA's current and planned products and
        services to identify and re-engineer those that could be placed on-line, with an
        emphasis on expanding customer transactions, as appropriate. This review should
        result in a plan that will (a) identify off-line products that have the potential to be
        on-line, (b) explain why an off-line product or service is not going to be on-line, (c)
        identify new opportunities for on-line transactions, (d) identify ways that existing
        on-line products and services will be improved, and (e) be updated annually or as
        needed.**

ITA comments:

ITA concurs with the IG's suggestions in the recommendation. ITA has taken action on some
components of the recommendation. ITA provided the study team with the information
collection review contained in our GPEA plan as directed by the CIO earlier this fiscal year.
That review identified off-line products that have the potential to be on-line and explained why
certain off-line products or services were not going to be placed on-line.

The results of our GPEA review enabled ITA to determine an ordinal approach to placing
information collections on-line. For example, ITA is more likely to redesign and implement an
on-line business process to collect customer information by an e-survey mechanism because it
impacts 25,000 respondents annually whereas another service, like the application for duty free
status of watch parts impacts only 6 respondents annually. This is one criterion. In other service
situations, ITA would like to move quickly to enable clients to apply for certain grant programs
or to complete an application for a subsidy petition on-line, however these collections have
privacy act data concerns or signature and certification issues which require resolution before

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creation of an electronic business process. Determining the priorities for products to place on-line is not the issue which requires the review and analysis. The more complex and time consuming effort involves determining how to revamp the process to create a new on-line business process that incorporates electronic signatures or certification of financial commitments.

As the report documents, ITA's U.S. and Foreign Commercial Service (US&FCS) has given its program office broad latitude to experiment with the web as a tool for serving the export community. The US&FCS has used the Internet as a means:
◆ to promote our services to the American public and specifically to small and medium size U.S. businesses;
◆ to more broadly share our market research with this target community, and;
◆ to make it easier for these U.S. companies to locate their local domestic export assistance office and commercial officers at our overseas posts.

ITA action:

◆ ITA has begun improving existing on-line products. Recent technology advances have been applied on a limited scale through pilot efforts in ITA programs with excellent results. For example, the Automated Contact Facilitation Program enabled over 9,000 Small/Medium sized enterprises (SME) firms to locate and use Export Trading Companies and export service providers. The New York and New Jersey Export Services Information Request has delivered information on international marketing opportunities, export financing and export credit assistance to 5,000 SME's in the New York Metropolitan area in the past year. Trade Development (TD) has implemented an on-line Internet Export Finance Matchmaker site that will aid 2,000 U.S. Firms to obtain sources for export financing. These examples illustrate the tremendous potential offered when technology is harnessed, improvements are made and business processes are redesigned.

◆ During the last two plus years the US&FCS has brought together, some of their most talented and energetic international trade and commercial specialists to serve on headquarters, domestic, and international e-commerce teams. They have been diligent in their effort to involve staff who have daily contact with small and medium size enterprises in our development efforts. They have had these teams travel extensively to meet with their colleagues and business executives to contribute to their understanding of the export needs of U.S. companies.

◆ The US&FCS recently added four additional international trade specialists with a variety of export and program experiences. These individuals will assume responsibility for US&FCS web content, international seller and association outreach, promotion and marketing, and the integration of web initiatives with those of other ITA program offices. The US&FCS now has seven (7) US&FCS and three (3) contract employees assigned to the Electronic Commerce Task Force (ECTF). This application group is in addition to several other US&FCS staff working on our e-Menu and Intranet re-engineering efforts in

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conjunction with other ITA program units.

◆ ITA is preparing materials for a session scheduled for mid-April which includes e-commerce experts from the Department's CIO office, experienced subject experts who have placed information products on-line and presenters from the General Counsel's staff who will be able to address electronic signatures, on-line financial commitments, certification requirements and privacy act issues. ITA is also utilizing the Justice Department guidance issued in the first quarter of the fiscal year entitled, " Legal Considerations in Designing and Implementing Electronic Processes: A Guide For Federal Agencies. ITA will certainly consider expanding it's coverage to other information products and services *after* it complies with the requirements identified in GPEA.

◆ ITA considers e-business based redesign of its business processes to be essential to ensure effective service delivery to ITA's geographically dispersed clientele. ITA will continue to measure the results through performance outcome measures. ITA will also monitor and gauge changes to customer satisfaction based on client satisfaction measures for accuracy and timeliness. ITA currently measures overall satisfaction rates and product/service specific satisfaction rates for accuracy and timeliness. We anticipate that these rates should increase with improved electronic access and e-commerce solutions.

◆ ITA will update on-line products as needed in *real time*. ITA has found that annual updates is an arcane concept regarding web-based products and services. Site updates occur as frequently as needed based on shifting technologies and web enhancement.

◆ The U.S. Commercial Service has been re-engineering its business processes. They have succeeded in tying their legacy information technology services directly into their web services. They have redesigned information handling processes so they can be re-purposed at will to meet the needs of ITA. As a result of this extensive self-examination they have began an intensive IT redesign and rapid development effort to simplify and move their worldwide business processes onto the Internet.

Among the business processes that have been re-engineered within the U.S. Commercial Service are how they: plan, approve, and stage export events and activities; they have redefined their products and services to take advantage of today's technologies; made sure our local office contact information is readily accessible and always current; and, office and event financial management.

In response to client requests to make transactions with the US&FCS simpler, they have included online credit card transactions among recent initiatives. It is their intent to expand Commercial Service's online credit card transaction processing to all activities where Internet bandwidth is not an issue. By the end of February 2001, 92% of US&FCS employees worldwide were connected to the Internet from their desktop computers. By the way, our average monthly secured online credit card transaction total now exceeds

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$300,000.

They expect to soon have the capability to send an email to a SME client that confirms the negotiated service and provides a web link to a page that references the service they acquired by name and action code. After the transaction is validated, a printable statement that describes the service and fee that was charged would appear on the client's web browser. A similar web form approach will be used to gather and route comments and suggestions on how the Commercial Service can make its web offerings more effective

4.   Make appropriate use of feedback mechanisms to improve web sites, such as establishing policies and procedures for collecting and managing e-mail feedback from users and utilizing focus groups, real-time surveys, and web statistics

ITA action:

We agree with this recommendation and have already held extensive discussions on ways to better utilize customer input to improve ITA's web presence. A component of the IPTF's Phase II development of Export.gov, is a plan to collect user feedback through the use of online surveys and real-time focus groups. This three-part focus group plan, approved by Accenture and the IPTF, is designed collect user feedback on Export.gov navigation, content, and organization utilizing the following techniques:

(1) an online user survey accessible via the Export.gov home page;

(2) an ongoing plan initially involving a 10 company focus group of U.S. companies selected from the Small Business ISAC-14 and clients of SBDCs and USEACs. Similar focus groups would be repeated with smaller, five-company groups on a quarterly basis;

(3) an ongoing focus group of SBDC Export Counselors and DoC HQ and field Trade Specialists. (See attached Three Part Focus Group Plan)

This focus group plan is in addition to a website design plan that will direct user comments and questions to the appropriate administrative unit and the application of Webtrends software on the export.gov server to collect user statistics.

5.   Develop internal standards and guidelines for maintaining high-quality web sites. The guidelines should include specific instructions to web masters and web site owners about cookies, archiving information, identifying when information was posted or last updated, and maintaining external links to ensure that they are valid, operational, and clearly identified as external links.

ITA action:

As part of Phase II of ITA's web project, ITA began work on developing a set of consolidated web development standards in October 2000. These standards include policies and guidelines in

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the following areas: document naming conventions, site structure, web content, page structure and appearance, multimedia usage, web page templates, html coding standards, accessibility standards, including Section 508 of the Rehabilitation Act, and usability standards. In addition, they contain reference to all of the DOC Web Standards, and will be amended as these guidelines are updated. The first draft of the standards document are due to be released on Monday, March 26.

The ITA Web Standards will apply across the organization according to an agreed upon implementation time line. Using a staggered timetable, we envision all sites to have implemented the standards by February 1, 2002.

6.   Ensure prompt compliance with Departmental web site standards

ITA action:

As recognized in the report, ITA has already made extensive progress in assuring compliance with the Departmental web standards. We will continue to work toward full compliance.

7.   Prepare the necessary guidance to ensure that all staff are regularly informed about the Paperwork Reduction Act and its restrictions on collecting information and conduct periodic reviews of web sites to ensure compliance with the act.

ITA action:

◆   ITA has prepared and made guidance available on-line and offers service to ITA program units regarding the paperwork reduction act and its limits on collecting information.

◆   During the past year, ITA has issued announcements, conducted an information briefing of ITA webmasters and examined all ITA official web sites for compliance with the PRA. We evaluated all application/registration forms to ensure that the data were not intrusive or unnecessary and removed questionable information collections from four web sites. The review of sites concluded that ITA was in full compliance with the PRA.

◆   ITA has also established controls to ensure that each collection of information is authorized under OMB guidelines, especially because more stringent rules have applied since the PRA's reauthorization in 1995. We provided a list of existing collections of information and their expiration dates to ITA Assistant Secretaries in a memorandum. This memo reiterated the importance of compliance with the PRA.

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◆   ITA will conduct an annual review of ITA web sites for compliance with both the
        Paperwork Reduction Act and the Privacy Act in addition to periodic spot checks. ITA
        will continue to notify DAS -level officials when a violation of either the PRA or the PA
        occurs. ITA will continue to issue reminders to ITA officials, maintain guidance, and
        consider other controls or clearance mechanisms which may improve our ability to
        identify changes/revisions and new features posted to recently created or updated web
        pages.

In the course of this review, the OIG identified several web sites where they believed that PRA
violations had occurred. The URL used by the IG for one of these collections was actually the
test/developmental site and was not the correct URL for the "live" version. This is useful to ITA
as well because it demonstrates the need for ITA test/developmental sites to contain a statement
indicating that the site is for test purposes only. Please note the chart below which indicates
ITA's disposition of PRA issues related to each of these sites:

URL TITLE	FINDING	Disposition of PRA Issue
http://infoserv2.ita.doc.gov/ete/eteinfo.nsf/s urvey?Openform NON-TARIFF BARRIERS SURVEY	The IG had identified this URL as missing OMB information burden statement and OMB authorization.	The IG notified the ITA information collection staff about this collection and a PRA request for authorization was submitted and is pending review at OMB.
http://tinet.ita.doc.gov/tinews/subscribe.htm l?ti_cart_cookie=20001130.155112.23651 SUBSCRIBE TO TINEWS	Missing OMB information burden statement and approval number.	The IG notified the ITA information collection staff about this collection and ITA staff have since worked with TI to remove certain questions from the page. Once these questions were deleted from the web form, the collection no longer requires OMB approval.
http://www.oceac.com/contactus.htm EXPORT ASSISTANCE CENTER INTERNET WEBSITE FORM	Missing OMB information burden statement.	The IG notified the ITA information collection staff that the OMB information burden statement was missing. It has now been added to web form. Approved under OMB No.: 0625-0237

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URL TITLE	FINDING	DISPOSITION OF PRA ISSUE
http://www.ita.doc.gov/td/sif/please_add_me_to_your_mailing_li.htm SIF MAILING LIST	Missing OMB information burden statement and approval number.	Although the IG believes this mail list instruction requires PRA authorization, the Department's OCIO previously determined that this collection did not require OMB approval. ITA has obtained additional documentation from the Department which confirms no authorization is required.
http://www.bisnis.doc.gov/bisnis/data/bismail0.cfm BISNIS PUBLICATION SUBSCRIPTION FORM	Missing OMB information burden statement.	The IG notified the ITA information collection staff that the OMB information burden statement was missing. It has now been added to web form. Approved under OMB No.: 0625-0236
http://infoserv2.ita.doc.gov/efm/efm.nsf/d04dc5335c665f55852567cf000f715e!OpenForm INTERNET EXPORT FINANCE MATCHMAKER	Missing OMB information burden statement and approval number.	The IG notified the ITA information collection staff that the OMB information burden statement was missing. We have determined that the IG was reviewing the developmental/test site for the form instead of the "live" site. The required information (OMB information burden statement and approval number) are on the current site at http://www.ita.doc.gov/td/efm/ Approved under OMB No.: 0625-0232
http://web.ita.doc.gov/safeharbor/shreg.nsf/safeharbor?openform INFORMATION FOR CERTIFICATION UNDER FAQ OF THE SAFE HARBOR PRIVACY PRINCIPLES	Approved form, missing OMB Control Number and Burden Statement	The IG notified the ITA information collection staff that the required OMB information was missing. It has now been added to the web form. Approved under OMB No.: 0625-0239

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8.   Take appropriate action to ensure on-going compliance with Section 508 of the Rehabilitation Act once it becomes effective on June 21, 2001

ITA action:

ITA has already devoted significant attention to compliance with Section 508 requirements. As noted above, ITA began work on developing a set of consolidated web development standards in October 2000. These standards include policies and guidelines in accessibility standards, including Section 508 of the Rehabilitation Act, and usability standards. We will continue to expand this attention and strive towards full compliance as clearer guidance becomes available.

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GENERAL POINTS:

1.)   *Title: Although Progress Has Been Made, More Needs to be Done to Deliver On-line
       Export Information and Services*

       When taken on balance, the report is positive about improvements in ITA's web presence.
       Reading just this title, however, would lead to the conclusion that not much progress has
       been made. Therefore, we recommend changing the title to reflect recent positive changes
       in ITA's web sites, such as: *Although More Needs to be Done to Deliver On-line Export
       Information and Services, ITA is well on its way to achieving a model web presence.*

2.)   *Executive Summary, p. ii: "Finally, ITA has undertaken two commendable efforts to
       organize its on-line information to make it more user friendly. First, it reorganized the
       ITA homepage to provide a portal through which the users can readily access
       information by topic instead of by organization. Second, another portal will provide
       access to all federal agency export promotion efforts."*

       ITA has created only one portal–Export.gov–but has also redesigned its home
       page–Trade.gov.

       Beginning in May of 2000, as a result of a recommendation made by the Strategic
       Planning Task Force, the ITA Portal Task Force (IPTF) set out to create an export portal
       that would contain links to all U.S. Federal Government export-related information. After
       the first five weeks, the IPTF had consolidated and catalogued all of ITA's export
       information into five intentions: Explore Exporting, Make Export Sales Happen, Expand
       Your International Business, Solve Trade Problems, and Find a Partner in the U.S.

       The next step was to incorporate all DOC export-related information into these five
       intentions. Once this was accomplished, ITA soft-launched Export.gov–the URL for the
       new portal–in September of 2000.

       Since then, the IPTF has worked to expand Export.gov to include all Federal Government
       export-related information. This resulted in a refinement of two of the intentions: "Make
       Export Sales Happen" and "Expand Your International Business" were consolidated into
       one intention under the title "Make Export Sales Happen", and a new intention–"Finance
       Your Exports"–was added. The redesigned Export.gov (screen shot is below) carries an
       agency-neutral banner on each page, and it has been proposed that each page linked into
       the portal will carry an Export.gov seal. The expanded Export.gov will be launched this
       Spring.

       As a parallel effort, the IPTF has also reorganized the ITA home page–Trade.gov–to be
       intentions-based and to include links into Export.gov. The five intentions from
       Export.gov also appear on the home page of Trade.gov, but they are not a separate
       portal–links take the user directly into Export.gov.

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In light of this background, all reference to the "ITA Trade Portal" should be removed from the report

Screen Shot of Export.gov Redesign

3.) *Executive Summary, p.iii: "Guidance is needed for the construction and maintenance of ITA's web sites. Currently, ITA does not have any standards to manage or control the production of its estimated 300 and more web publishers and content providers."*

Based on recommendations coming from Phase I of the ITA web project, the IPTF began work on Phase II in October 2000, which included developing a web governance structure, ITA-wide Internet standards (see attached web standards) and performance measures, a plan to eliminate duplication of content, and a strategy for implementing functionality, including a search engine.

There are a number of places in the report that recommend the development of standards–these need to be amended as per the above information.

4.) *Observations and Conclusions, p. 6: "Table 1: Characteristics of Four Customer-Oriented ITA Web Sites"*

Export.gov–the export portal–contains links to all U.S. Federal Government export-related information. Trade.gov contains links to Export.gov and other ITA web sites in an

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intentions-based format. It has been online since August 2000. (See #2 for background on Export.gov and Trade.gov.)

5.)   *Observations and Conclusions, p. 7: "According to one ITA official, in the past year the Center responded to over 75,000 questions, not including e-mail requests for information."*

On page 7, first paragraph, the TIC responded to 77,000 questions, not 75,000 as indicated.

6.)   *Observations and Conclusions, p. 9: "However, immediate problems of implementing both the ITA portal and the export portal have taken precedence over moving ahead with the second phase."*

Phase II of the ITA web project, which began in October 2000 focused on developing a web governance structure, ITA-wide Internet standards and performance measures, a plan to eliminate duplication of content, and a strategy for implementing functionality, including a search engine. There were no problems with Export.gov or Trade.gov that prevented this work from going forward.

7.)   *Observations and Conclusions, p. 11: "Table 2: Duplication of Information on Web Sites."*

The TIC site only provides links to trade missions and events; it does not actually post the information. It does have a trade education events database, however, which includes training seminars.

8.)   *Observations and Conclusions, p. 13: "Given the existence and experience of the current task force, a small increase in funding could enable it to take on projects with a broader ITA-wide scope."*

ITA is in the process of forming a CIO's office, which will take over function of coordinating and consolidating ITA sites, along with the ITA Web Governance Council. (See response to recommendation #1 for more detail.)

9.)   *Observation and Conclusions, p. 14: "ITA has a poor history of coordination."*

As evidenced by this report, ITA coordination throughout the portal project has been exemplary and has shown how we have learned from our mistakes and moved forward. This statement may give readers the wrong impression that ITA has not made improvements in coordination of its web presence.

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10.) *Observation and Conclusions, p. 15: "To ensure that there is only one official export portal, ITA should obtain the TPCC's commitment to a single government-wide portal and formalize the TPCC working group into a board to govern web site development and maintenance."*

ITA has already obtained the commitment of the TPCC on the working-level to a single government-wide portal. Meetings are being held on a bi-monthly basis and are led by the TPCC Secretariat. In addition, ITA has received OMB support for the consolidation of Tradenet with Export.gov (See attached consolidation plan). We are in the process of formalizing a governing board for Export.gov.

11.) *Observation and Conclusions, p. 16: "There has never been sufficient buy-in from ITA because Tradenet has been viewed as an SBA site, according to officials from both agencies. These factors have contributed to the site's relative lack of visibility. Given these problems, the SBA project manager has suggested that Commerce take over the Tradenet portal. However, ITA has resisted taking over Tradenet preferring to build its own. At present, both the export and Tradnet portals remain on-line, with each portal linking to the other. Despite the fact that the export portal currently lack a search engine and must of the functionality of the Tradenet site, ITA intends for the export portal to become the primary export promotion web site in the federal government...Nonetheless, ITA's creation of the export portal represents a duplication of resources and effort that could have been avoided had there been better coordination with in the TPCC from the outset."*

The characterization of the relationship between ITA, Export.gov and Trade.gov is not fully accurate.

1. Lack of buy-in for Tradenet in ITA was based on its poor maintenance and quality. Failure to properly market Tradenet, has been the largest contributor to the site's relative lack of visibility.

2. ITA has never resisted the concept of taking over Tradenet. Resistance has come primarily from SBA.

3. We have made progress towards obtaining functionality, including a search engine.

4. We do not view the creation of an export portal focusing on client needs and containing up-to-date, high quality content as a duplication of resources and effort.

12.) *Observation and Conclusions, p. 24: "the Trade Information Center has the responsibility for responding to student research questions because it can quickly and efficiently..."*

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The Trade Information Center does not have the responsibility for responding to student research questions. In fact, the TIC discourages students from calling the office directly by directing them towards specific on-line resources for their research questions.

13.) *Observation and Conclusions, p. 24: "However, the banner, and subsequently the "contact us" page, are to be eliminated from ITA web sites, except the home page of the ITA portal...If the banner, which currently appears on every page of ITA's web sites, is eliminated, ITA should establish a policy requiring all units and offices to place a customer feedback option on their sites similar to the one that appeared on the portal banner."*

We have no plans to eliminate the consistent header on Export.gov. We have redesigned the site to eliminate frames, but have replaced them with a banner (shown below) and consistent navigation scheme (shown below), which will include a "contact us" option. We have also already developed a policy requiring all units and offices to place a customer feedback option on their site.

New Banner Appearing on Export.gov and ITA Pages
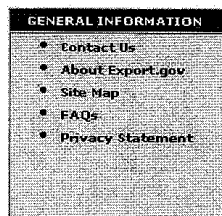
Common Navigation Box Appearing on Export.gov and ITA Pages

14.) *Observation and Conclusions, p. 27: "Figure 5: Selected Customer Comments about ITA Web Sites"—"ITA's site should provide business information by sector, trade data on-line, and customized market reports."*

This comment is not made with knowledge of ITA offerings. ITA's sites do provide business information by sector (www.trade.gov/td), trade data online

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(www.trade.gov/tradestats), and customized market reports
(http://www.usatrade.gov/Website/Website.nsf/WebBySubj/
MarketResearch_FlexibleMarketResearch)

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Consolidation of Tradenet and Export.Gov

Draft Plan

Purpose:

The objective of this paper is to set out broad guidelines for the consolidation of TradeNet and Export.Gov into one trade portal.

Background:

Increased exports, especially by small companies, is a major policy goal of the Trade Promotion Coordinating Committee member agencies and an important component of continued U.S. economic growth. A multi-agency Internet gateway to international trade information and services is a critical component to our strategy for achieving this objective.

Currently there are two principal government sites that small businesses can use to get information about exporting, TradeNet and Export.Gov. Both sites have a number of strengths and weakness. To help us focus on the strengths of both sites and better serve small businesses, we will consolidate these sites into one site under the management of the Trade Promotion Coordinating Committee. The site will be hosted by the International Trade Administration, (which also serves as secretariat to the TPCC) and be branded by the Export.gov url.

Key Issues:

In order to ensure that small business users are not disrupted by the transition, it is important that we focus on functionality and content issues:

Functionality of Tradenet	Can be transferred to Export.Gov
Search engine	No, function is licenced from TradeNet hosting contractor
Personalization	No, function is licenced from TradeNet hosting contractor
Expert Tools	Yes, on a case by case basis.
	- trade finance tool needs to be completed
	- trade leads tool needs to be updated
	- zip code search export.gov will have to write its own.

Content

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Trade finance	Yes, needs to be mapped
Trade education	Yes, needs to be mapped and SBDCs need to be contact on updating
Export promotion	Yes, where needed to be mapped (most of content is on Export.Gov)
FAQs	Yes, needs to be mapped

Time Table: (Can be done concurrently)

Step 1: Map Content (by March 22nd)

Step 2: Meet with contractor to move content and discuss how to integrate of expert tools (meet week of March 12th)

Step3: What functionality needs to exists on site before launch.

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Export.gov

Three-Part Focus Group Plan

The Export Portal is a multi-agency effort to collect and organize all government export-related data and program information under a unified, intentions-based web presence. Information contained within Export.gov conforms to one or more of the following content categories:

* General information on exporting and the export process including documentation, logistics, restrictions, customs, etc.,

* Information about government-sponsored export programs and services aimed at assisting the U.S. exporter,

* Information on where a current or potential U.S. exporter can obtain counseling and assistance,

* Industry and country-specific market research,

* Government assistance and recourse procedures to remedy real or perceived unfair trade practices domestically and overseas,

* Information on USG export finance and insurance programs,

* Trade Events and Seminars – (dates, locations, types of events, descriptions, size, venues), and

* Potential trade leads.

Goals:

The intent of the focus group plan is to evaluate Export.gov to determine whether it is adequately providing the U.S. exporter a clear and easily navigable website covering all government-related aspects of exporting and the export process. To do this the goal of the focus group plan will be to collect primary data on our taget audience – small and medium-sized exporters: The plan will evaluate

1. Type(s) of export-related information the U.S. exporter is seeking.

2. Site navigation: Is the site navigation clear and logically laid out?

    A.   Is our method of intentions-based navigation clear or should it be redefined?

    B.   Do our intentions match up with those of our users?

    C.   The ease in which a target user is able to access desired information

3. Prioritization of information: Does the layout of Export.gov reflect what the user believes to be important? Are the are we prioritizing the right type(s) of information? .

In order to collect primary data on our target audience regarding these two aspects of site functionality (clear intentions and logical navigation), a three part focus group will be developed to elicit feedback. Focus groups of this kind should continue with one occurring every four months through the next year to insure the needs of our target audience are being adequately met by our web

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presence. The frequency of these focus groups can then be re-evaluated to occur more or less frequently depending upon perceived need.

The Three-Part Focus Group Plan:

The focus group plan will be implemented in accordance to all requirements mandated by the Paperwork Reduction Act (PRA). ITA will work with Department and OMB officials to ensure PRA compliance. The focus group plan will be composed of three primary parts:

A)   **An initial ten-member panel consisting of SMEs across a number of differing industry sectors.** Panel would consist of:

-     Small Business ISAC members. (ISAC -14, Small & Minority Business Council)

-     DEC members

-     local SBDC and EAC clients

-     participating associations

This focus group would be repeated on a quarterly basis utilizing a smaller, five-company panel.

B).   **A ten-member panel of trade specialists and export counselors.** Panel would consist of:

-     USFCS trade specialists located in USEACs

-      SBA Export Consultants from relevant SBDCs

-     Select representatives from the TIC, TD, and MAC

C)   **A questionnaire posted on the website.** Ongoing collection of user feedback will solicit comments from a wider audience on the navigation and content of Export.gov.